

East Havering Data Centre Campus

Draft Equality Impact Assessment

London Borough of Havering

February 2026

Quality information

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Revision History

Revision	Revision date	Details	Authorized	Name	Position
Draft EqIA	31/10/25	Draft EqIA for client review	EK	Dr Eva Kleinert	Associate Director
V2 Draft EqIA	27/11/25	Draft EqIA for legal review	EK	Dr Eva Kleinert	Associate Director
Final Draft EqIA	08/01/26	Final Draft EqIA for consultation	EK	Dr Eva Kleinert	Associate Director
Updated Draft EqIA	19/02/26	Final Draft EqIA (including CoCP updates)	CT	Cat Thornton	Social Impact Consultant

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1. Introduction

1.1 Purpose

AECOM has been commissioned by the London Borough of Havering in their function as a Local Planning Authority (LPA) to prepare an Equality Impact Assessment (EqIA) to support East Havering Data Centre Campus Draft Local Development Order (LDO), ('the Proposed Development').

The London Borough of Havering's Economic Development Service has been in discussions with a private sector developer, Digital Reef (the 'potential beneficiary of the LDO') in respect of Digital Reef's proposal to build a data centre campus on land at North Ockendon within East Havering ('the Site').

As a statutory planning authority, the LPA would permit development rights through the adoption of the LDO. Whilst the LPA sits within the Council, it has a distinct statutory role to exercise urban planning functions for the Borough and must act independently of other Council departments. Throughout the EqIA, reference to 'the Council' refers to any part of the Council other than the Local Planning Authority.

The LPA, as a public body, has a duty under the Equality Act 2010 and the associated Public Sector Equality Duty (PSED) to ensure that the Proposed Development does not lead to unlawful discrimination, and that it advances equality of opportunity and fosters good relations between those with a protected characteristic¹ and all others. This EqIA demonstrates how the aims of the PSED have been considered by the LPA as part of the LDO and will support the LPA in decision-making and having regard to the needs under the PSED on the basis of an informed, evidenced understanding of relevant equality issues going forward.

An EqIA is a systematic assessment of the effects of plans, policies, or proposals on groups with protected characteristics as defined by the Equality Act 2010. This EqIA is based on professional judgement and provides a consideration of potential direct and indirect equality impacts (both adverse and beneficial) associated with the construction and operational phases of the Proposed Development. The approach draws on evidence from secondary data sources to identify how due regard has been paid to equality issues and effects, describing any interventions to optimise the potential positive effects of the Proposed Development and mitigation to minimise or remove negative effects.

1.2 Context

The Proposed Development would deliver up to a maximum of 400,000 square metres (m²) gross external floor area comprising data centres, indoor horticulture facilities, district heating energy centre, visitor centre, campus management and security facilities; the installation of electrical infrastructure and associated plan equipment; and the creation of an ecology park.

The Proposed Development was presented to the Council's Cabinet in November 2022², where approval was given by the Director of Regeneration for the Council, in its capacity as LPA, to progress the initiative. The Council's Strategic Planning Committee (SPC) was

¹ Protected characteristics are defined under the Equality Act 2010: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation and marriage/civil partnership.

² London Borough of Havering (2022). Cabinet to consider £5.3bn investment opportunity for Havering. Available at: [Agenda for Cabinet on Wednesday, 9th November, 2022, 7.30 pm | London Borough of Havering](#) [accessed: 09/04/25].

briefed about the Proposed Development later in April 2023³ and a further report was presented to the SPC in June 2023 at which point it was confirmed that the Proposed Development would be explored through the lens of an LDO.⁴ A further update to SPC was made in May 2024 confirming to residents that full public consultation will take place prior to making a decision on the LDO permission.⁵

LDOs were introduced under Section 40 of the Planning and Compulsory Purchase Act 2004⁶ which has the effect of amending the Town and Country Planning Act 1990.⁷ This measure was promoted by the Government as a means of simplifying the planning permission process and providing certainty for prospective developers. An LDO grants permission for the type of development specified in the LDO and by so doing, removes the need for the submission of a planning application. An LDO must be accompanied by a Statement of Reasons that includes the description of the permitted development and that defines the area that it affects and must also be subject to formal consultation before it can be adopted.

1.3 Report structure

Following on from this introduction section, the remainder of this report is structured as follows:

- **Section 2: Methodology** – sets out the approach to collecting evidence and assessment of impacts;
- **Section 3: Policy and legislation review** – provides context through review of relevant national, regional and local policy and legislation associated with equalities;
- **Section 4: Summary of the Proposed Development** – presents an overview of the Proposed Development;
- **Section 5: Equalities baseline** – presents baseline information using secondary data sources such as Census 2021 to form an understanding of residents living within the area;
- **Section 6: Consultation and engagement** – presents an overview of community engagement undertaken to date and planned consultation on the draft LDO;
- **Section 7: Assessment of potential equality effects** – presents an assessment of equality effects of the Proposed Development using the evidence gathered; and
- **Section 8: Conclusions and next steps** – provides a summary of the key findings and next steps for the EqIA.

³ London Borough of Havering (2023). Plans for East Havering Data Centre shared at strategic planning meeting. Available at: [Plans for East Havering Data Centre shared at strategic planning committee | London Borough of Havering](#) [accessed: 09/04/25].

⁴ London Borough of Havering (2023). Strategic Planning Committee updated on East Havering Data Centre plans. Available at: [Strategic Planning Committee updated on East Havering Data Centre plans | London Borough of Havering](#) [accessed: 09/04/25].

⁵ London Borough of Havering (2024). Strategic Planning Committee updated on East Havering Data Centre plans. Available at: [Strategic Planning Committee updated on East Havering Data Centre plans | London Borough of Havering](#) [accessed: 09/04/25].

⁶ Secretary of State (2004). Planning and Compulsory Purchase Act 2004. Available at: [Planning and Compulsory Purchase Act 2004](#) [accessed: 10/04/25].

⁷ Secretary of State (1990). Town and Country Planning Act 1990 (as amended). Available at: [Town and Country Planning Act 1990](#) [accessed: 10/04/25].

2. Methodology

2.1 Introduction

This section sets out the approach to assessing the equality impacts of the Proposed Development. The assessment considers how the Proposed Development could impact (both positively and negatively) current residents and future residents and visitors to the area who share protected characteristics.

The approach for undertaking this EqlA and compiling this report follows a two-stage process:

- **Desk-based review** - including review of relevant national, regional and local policies and legislation, documents prepared for the proposed LDO and secondary datasets relating to groups with protected characteristics; and
- **Assessment of potential impacts** - informed by a consideration of the policy context and equalities baseline data.

The approach is based on AECOM's understanding of the Equality Act 2010, particularly section 149 regarding the PSED, as well as AECOM's in-house approach to conducting EqlAs.

2.2 Desk-based review

In addition to a review of recent relevant national, London-wide and local policies and legislation, the desk-based review included the following:

- Review of all relevant accompanying LDO submission documents including the Environmental Statement; and
- Review of national and local datasets to develop an equality baseline profile of the resident population and groups with protected characteristics within and surrounding the Site including Census 2021 data.

2.3 Assessment of impacts

The assessment of equality impacts takes into account the information gathered through the above activities. A judgement has been made as to how the Proposed Development would contribute to the realisation of effects for people with protected characteristics as defined in the Equality Act 2010. These protected characteristics are:

- **Age:** this refers to persons defined by either a particular age or a range of ages. This can include children (aged under 16), young people (aged 16-25), older people or pensioners (i.e. those aged 65+), the elderly/very old (i.e. those aged 85+);
- **Disability:** a disabled person is defined as someone who has a physical or mental impairment that has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. It can also include people who have progressive conditions such as HIV, cancer, or multiple sclerosis (MS) - even where someone is able to carry out day to day activities;
- **Gender reassignment:** this refers to people who are proposing to undergo, are undergoing, or have undergone a process for the purpose of reassigning their gender identity;
- **Marriage and civil partnership:** marriage or civil partnership can be between a man and a woman or between two people of the same sex;

- **Pregnancy and maternity:** pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth;
- **Race:** the Equality Act 2010 defines race as encompassing colour, nationality (including citizenship) and ethnic or national origins;
- **Religion or belief:** religion means any religion a person follows. Belief means any religious or philosophical belief, and includes those people who have no formal religion or belief;
- **Sex:** this refers to a man or to a woman or a group of people of the same sex, while gender refers to the wider social roles and relationships that structure men's and women's, boys' and girls' lives;
- **Sexual orientation:** a person's sexual orientation relates to their emotional, physical and/or sexual attraction and the expression of that attraction.

Although income is not classed as a protected characteristic under the Equality Act 2010, the assessment also considers the additional impact of disproportionate and differential effects on socio-economically disadvantaged groups with protected characteristics.

The assessment considers both disproportionate and differential impacts on groups with protected characteristics. A disproportionate equality effect arises when an impact has a proportionately greater effect on protected characteristic groups than on the general population overall at a particular location. For the purposes of this EqIA, disproportionate impact arises:

- Where an impact is predicted for the study area, where protected characteristic groups are known to make up a greater proportion of the affected resident population than their representation in London; or
- Where an impact is predicted on a community resource which is predominantly or heavily used by protected characteristic groups (e.g. primary schools attended by children; care homes catering for elderly people).

A differential equality effect is one which affects members of a protected characteristic group differently from the rest of the general population because of specific needs, or a recognised vulnerability associated with their protected characteristic.

In some cases, protected characteristic groups are subject to both disproportionate *and* differential equality effects. The EqIA considers impacts on groups of people and not those on specific individuals.

2.4 Conclusions and next steps

The final section of this report sets out conclusions on the potential equality impacts as well as setting out next steps pursuant to the proposed LDO.

3. Policy and legislation context

3.1 Legislation

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

The Equality Act 2010 (the 'Act') provides the framework to protect the rights of individuals against unlawful discrimination and to advance equal opportunities for all. Section 149 of the Equality Act sets out the PSED to which the Council, as a public body, is subject in carrying out all its functions.

Those subject to the PSED must, in the exercise of their functions, have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act;
- Advance equality of opportunity between people who share a protected characteristic and those who do not; and
- Foster good relations between people who share a protected characteristic and those who do not.

These are sometimes referred to as the three aims or arms of the PSED. The Act explains that having due regard for advancing equality involves:

- Removing or minimising disadvantages suffered by people due to their protected characteristics,
- Taking steps to meet the needs of people from protected groups where these are different from the needs of other people, and
- Encouraging people from protected characteristics groups to participate in public life or in other activities where their participation is disproportionately low.

The Act states that meeting different needs involves taking steps to take account of disabled people's disabilities. It describes fostering good relations as tackling prejudice and promoting understanding between people from different groups. It states that compliance with the duty may involve treating some people more favourably than others.

The duty covers the following eight protected characteristics: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation as described Section 2.5 of this report.

Public authorities also need to have due regard to the need to eliminate unlawful discrimination against someone because of their marriage or civil partnership status. This means that the first arm of the duty applies to this characteristic, but that the other arms (advancing equality and fostering good relations) do not apply.

3.2 National policy

National Planning Policy Framework (December 2024)

The National Planning Policy Framework (NPPF)⁸ was published in December 2024.

The NPPF sets out the Government's planning policies for England and how they should be applied, providing a framework within which locally prepared plans can provide for sufficient

⁸ Department for Levelling Up, Housing & Communities (2024). National Planning Policy Framework. Available at: <https://assets.publishing.service.gov.uk/media/675abd214cbda57cacd3476e/NPPF-December-2024.pdf>

housing and other development in a sustainable manner. While the NPPF does not contain specific guidance on equalities, it does emphasise the importance of sustainable development and the need to support a healthy and just society. This is reflected in the key overarching objectives of sustainable development which relate to the economic, social and environmental roles of the planning system:

- The economic role contributes to building *“a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure”*;
- The social role supports strong, vibrant and healthy communities by *“ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being”*; and
- The environmental role contributes to protecting and enhancing the *“natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy”*.

The NPPF states that strategic policies should make sufficient provision for multiple factors, including:

- Homes, employment, retail, leisure and other commercial development; and
- Conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure.

3.3 Regional policy

The London Plan 2021⁹

The London Plan 2021 aims to be more ambitious and focused than previous London Plans. It is underpinned by the concept of Good Growth – growth that is socially and economically inclusive and environmentally sustainable. As the overall strategic policy framework for London, it sets out integrated economic, environmental, transport and social goals for the development of the capital over the next 20-25 years. A number of policies outlined in the Plan are relevant to the Proposed Development, specifically:

- GG5 ‘Growing a good economy’: aims to boost London's global economic competitiveness and ensure all Londoners benefit from its success. It focuses on diversifying the economy, providing affordable infrastructure, supporting innovation and promoting a low carbon economy;
- D8 ‘Public realm’: aims to create new public spaces where appropriate and ensure these spaces are well-designed, safe, accessible and attractive, with a focus on how public spaces function at different times and cater to the needs of pedestrians and cyclists.
- E11 ‘Skills and opportunities for all’: Skills and Opportunities for all requires that strategic development proposals should support local employment, skills development, apprenticeships, and other education and training opportunities in both the construction and end-use phases, including through Section 106 obligations where appropriate. The Plan notes continuing large inequalities in access to jobs and

⁹ Mayor of London (2021). The London Plan 2021. Available at: [The London Plan 2021 | London City Hall](#)

levels of worklessness, and that low pay and gender and ethnicity pay gaps are critical issues;

- G1 'Green infrastructure': protection and enhancement of London's green spaces and features with green infrastructure through Boroughs creating strategies for green infrastructure and identification of green assets and opportunities for addressing environmental and social challenges; and
- G2 'Green Belt': protection of Green Belt land from inappropriate development with proposals that harm it being refused unless very special circumstances exist and the enhancement of Green Belt should provide multi-functional beneficial uses for Londoners should be supported.

Inclusive London: Mayor's Equality, Diversity and Inclusion Strategy (2022)¹⁰

The Mayor's Equality, Diversity and Inclusion Strategy (EDIS) was published in May 2018. It sets out how inequalities, barriers and discrimination experienced by groups protected by the Equality Act will be addressed.

The Strategy presents 39 equality, diversity and inclusion strategic objectives. These were replaced in November 2022 by the Mayor who published a set of 14 equality objectives.¹¹ These include working with councils and other partners to:

- Objective 4: Improve Londoners' air quality and access to green space and lower the city's carbon emissions so that inequalities in exposure to harmful pollution and climate risks are reduced.
- Objective 9: To ensure London's workforce reflects its population at all levels and in all sectors.
- Objective 12: To address the reasons for health inequalities that cause some groups to experience poorer physical and mental health outcomes.

Objectives also include working with employers, education and skills providers, and voluntary and community organisations, so that as many Londoners as possible can participate in, and benefit from, employment opportunities in London. This includes providing employability and skills support for those who are disadvantaged in London's enterprise and jobs market and increasing the diversity of the workforces in vital sectors in London. These include the digital, construction, creative and built environment sectors.

3.4 Local policy

Havering Local Plan 2021¹²

Havering Local Plan (2016-2031) was adopted in 2021. During examination, the LPA committed to an immediate update of the Local Plan to reflect national and regional policy changes. The LPA is currently reviewing the evidence base to support the preparation of an updated Local Plan and new evidence base documents are published online.¹³

As the population of Havering is growing and becoming more diverse, the Local Plan aims to position Havering as an attractive and successful outer London Borough. The Council's

¹⁰ GLA (2018). Mayor's Equality, Diversity and Inclusion Strategy. Available at: <https://www.london.gov.uk/what-we-do/communities/mayors-strategy-equality-diversity-inclusion>

¹¹ GLA (2022). Mayor's Equality, Diversity and Inclusion Strategy. Available at: <https://www.london.gov.uk/programmes-strategies/communities-and-social-justice/mayors-strategy-equality-diversity-and-inclusion/mayors-equality-diversity-and-inclusion-strategy-objectives-2022>

¹² London Borough of Havering (2021). Havering Local Plan 2016-2031 adopted November 2021. Available at: [Local Plan 2016-2031 Adopted 2021](#) [accessed: 10/04/25].

¹³ London Borough of Havering (no date). Local Plan update. Available at: [Local Plan update | Planning policy | London Borough of Havering](#) [accessed: 10/04/25].

vision for Havering highlights four priorities: Communities, Places, Connections and, of particular interest to the Proposed Development, Opportunities:

- **Opportunities** – provision of first-class business opportunities by supporting the commercial development of companies within the borough, as well as being a hub for start-ups and expanding businesses. We will ensure sustainable economic growth that generates local wealth and opportunities, as well as securing investment in high-quality skills and careers.

The Local Plan has four overarching aims as listed below, that are being delivered through 23 Strategic Objectives.

1. To enable vibrant, inclusive, healthy and happy communities
2. To provide opportunities for businesses and local people to thrive
3. To create successful, high-quality places where people choose to live, work and spend time
4. To enhance physical and digital connections between places, communities and opportunities

These Strategic Objectives align with the Local Plan policies covering: Successful Places to Live, Thriving Communities, Opportunities to Prosper, Connections, High Quality Places, Green Places and Minerals. In particular, **Table 3-1** highlights the Local Plan policies of particular interest pursuant to the LDO for the Proposed Development.

Table 3-1: Local Plan policies relevant to the Proposed Development

Policy theme	Policy number	Policy
Opportunities to Prosper	Policy 19: Business Growth	The Council is committed to building a strong and prosperous economy in Havering and will encourage and promote business growth by: <ul style="list-style-type: none"> • Supporting the sustainable growth and expansion of business and enterprise in rural areas
	Policy 22: Skills and training	The Council will promote employment and skills development opportunities for local residents through supporting major development proposals that commit to: <ul style="list-style-type: none"> • Minimum local labour target of 20% during construction and end user phase for major commercial developments, including a proportion of apprenticeships where length of construction allows; • Notification of vacancies associated with developments through the Council’s employment services • Offer opportunities to local businesses within their supply chains Major development proposals will be expected to submit an Employment & Skills Plan for agreement with the Council to detail how these targets will be met.
High Quality Places	Policy 27: Landscaping	The Council will support development proposals that incorporate a detailed and high-quality landscape scheme which: <ul style="list-style-type: none"> • Takes full account of the landscape character of the site and its wider setting; • Retains and enhances existing landscape features that contribute positively to the setting and character of the local area;

		<ul style="list-style-type: none"> • Demonstrates how existing landscape features will be protected during the construction phase; • Supports natural habitats and opportunities for enhancing biodiversity <p>All proposals will be required to demonstrate that adequate arrangements have been made for future maintenance and management, and major development proposals should be supported by a comprehensive Management Plan.</p>
Green Places	Policy 29: Green Infrastructure	The Council will seek to maintain and expand the network of green spaces and natural features in Havering and optimise the benefits of green infrastructure to the environment, economy and community.

Over the 15-year plan period Havering’s residents and businesses will benefit from modern, high-quality infrastructure that enables economic and social growth, as well as the continued enhancement and value of Havering’s Green Belt assets offering recreation and leisure opportunities.

Havering Resident engagement and participation strategy 2024-2027¹⁴

Havering’s Resident Engagement and Participation Strategy (2024-2027) sets out a clear framework for how the Council plans to involve residents in shaping services and decisions. The strategy prioritises inclusive, transparent, and meaningful engagement, ensuring that all communities – particularly those with protected characteristics – can participate effectively.

The Strategy commits to applying best practice ‘*Gunning*’ Principles of Consultation to ensure that residents have sufficient information and that there is adequate time given to responses before a decision is made. This requires proposals to be at a formative stage as at consultation.

To achieve the Strategy, a range of practices are outlined including (but not limited to):

- **Use varied engagement methods:** a mix of digital and face-to-face methods, and other accessible communication channels to tailor approaches to diverse needs;
- **Develop a consistent approach to consultation and engagement,** embedding *Gunning* Principles for fair consultation;
- **Demonstrate community leadership** through visible engagement;
- **Demonstrate how residents feedback influences decisions** with a ‘You said, we did’ approach and monitoring outcomes annually; and
- **Coordinate campaigns and projects** to increase involvement and reduce duplication across council services.

Havering Statement of Community Involvement 2021¹⁵

The Statement of Community Involvement (SCI) outlines the Council’s framework for engaging with the local community in planning policy and decision making. There is an emphasis on early and meaningful participation to ensure that residents, businesses and underrepresented groups are actively involved in the engagement process. The SCI

¹⁴ London Borough of Havering (2024). Havering Resident engagement and participation strategy 2024 to 2027. Available at: [Havering Resident Engagement and Participation Strategy 2024 to 2027](#)

¹⁵

highlights the need for communication methods that maximise accessibility by using both digital and traditional approaches and offer alternative formats and translation services to remove barriers for disabled people and those with limited English proficiency. The Council have a consultation database which is used to reach out to 'quiet communities' to encourage broad participation and that all voices are heard.

4. Summary of Proposed Development

4.1 The Local Development Order

The Proposed Development would consist of:

1. The erection of buildings up to a maximum of 400,000 m² Gross External Area (GEA) including:
 - a) Data centre uses up to 340,000 m²;
 - b) Indoor horticulture of 50,000 m²;
 - c) Visitor centre up to 600 m² (and no less than 300 m²); and
 - d) Campus management facilities up to 2,700 m²;
 - e) Campus security facilities (not including local facilities ancillary to individual data centres) up to 3,400 m²; and
 - f) District heating up to 3,300 m²;
2. Installation of electrical infrastructure and associated plant equipment solely to serve the development;
3. Creation of an ecology park; and
4. Any operations or engineering works necessary to enable the delivery of the development including:
 - a) Excavation and earthworks (e.g. 'cut and fill');
 - b) Formation of compounds for the stockpiling and sorting of excavated materials;
 - c) Foundations and piling, and any other operations or engineering necessary for site mobilisation and new buildings / structures;
 - d) Creation of estate roads and associated infrastructure for access for all modes of transport;
 - e) Site security measures including fencing, gates and gate houses;
 - f) Works to install underground services and utilities; and
 - g) Provision of temporary site offices and welfare facilities.
 - h) Highway works on Fen Lane and Ockendon Road.

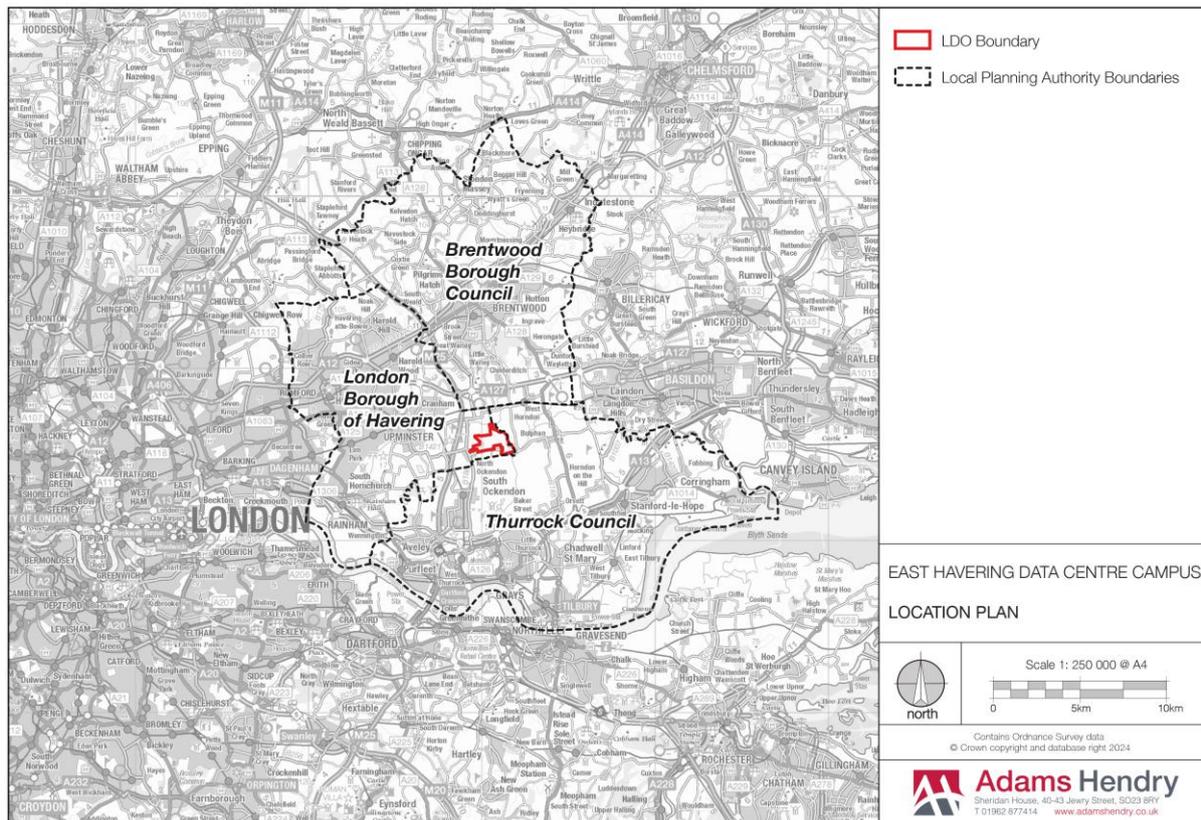
4.2 The Site and surrounding context

The Site is located within the administrative boundary of the London Borough of Havering within the London Metropolitan Green Belt, approximately 30km east of central London and 4km east of Upminster. The site boundary is bordered by the administrative area Thurrock Council to the east and is approximately 1.4km from the administrative boundary of Brentwood Borough Council to the north as shown in **Figure 4-1**.

The Site also forms part of the Thames Freeport economic zone¹⁶ established by the UK Government in 2021. Located in the Thames Estuary, this economic zone has the ambition to stimulate trade, foster innovation, support the energy transition and improve the lives of those in London and the surrounding eastern boroughs.

The Site comprises of agricultural green belt land that is the subject of an Option Agreement¹⁷ with the relevant landowners, enabling the delivery of the Proposed Development. At present, there are 3.5 permanent employees at the plant nursery and associated small holdings and 200 days of seasonal agricultural employment (approximately 0.5 FTE).

Figure 4-1: Site Location



The Site surroundings comprise agricultural land to the north, and suburban towns, villages and settlements, including:

- **North Ockendon** within the London Borough of Havering to the north-east, approximately 100m west of the site boundary;
- The village of **West Horndon** within the Borough of Brentwood to the north-east, approximately 2km from the site boundary;
- **Bulphan** within the Borough of Thurrock Council to the east, approximately 1.7km from the site boundary;
- **South Ockendon** within the Borough of Thurrock Council to the south west, approximately 3.5km from the site boundary; and

¹⁶ Thames Freeport (no date). Thames Freeport: Global Opportunity, Shared Future. Available at: [Thames Freeport: A Gateway to Economic Growth and Development](#)

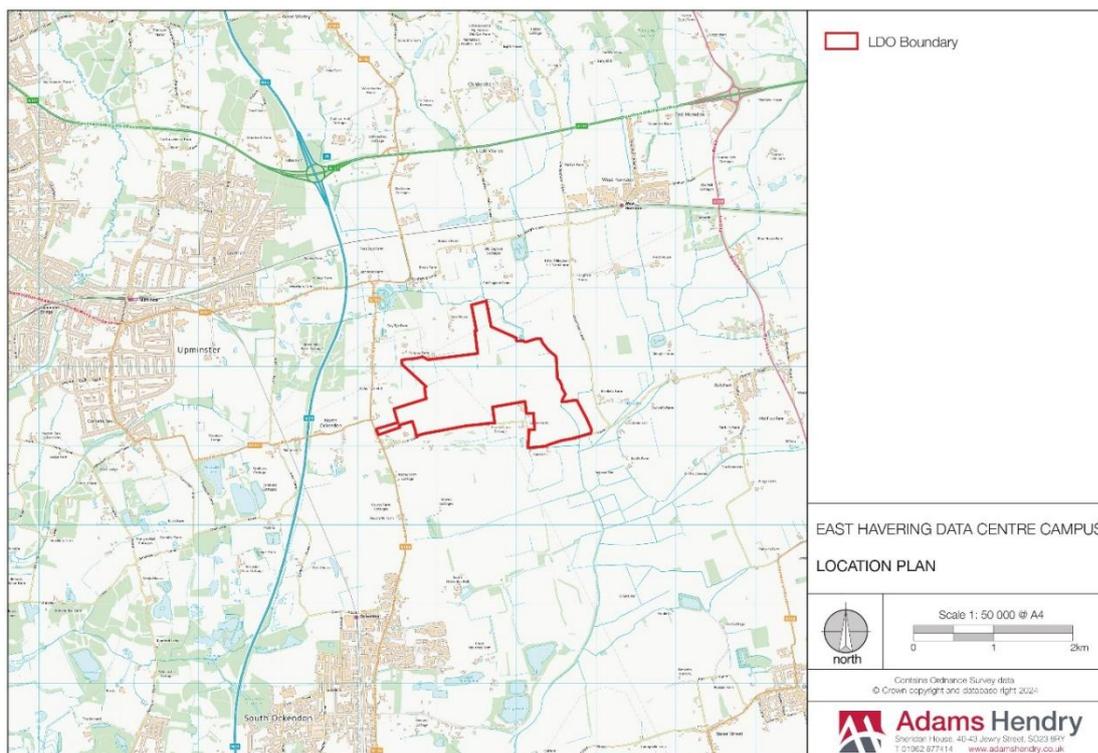
¹⁷ An option agreement is a contract between a landowner and a developer where the developer has the opportunity (but not an obligation) to purchase land from the landowner with a certain time frame.

- **Upminster** within the London Borough of Havering to the west, approximately 4km from the site boundary.

The surrounding land uses comprise residential, commercial, recreational and energy infrastructure uses, including:

- The closest residential properties of Home Farm located immediately adjacent to the southern boundary of the Site and north of Fen Lane. This land includes commercial buildings that are part of the wider Home Farm Estate and Bolyngtons that are accessed via an unnamed road off Fen Lane.
- Top Meadow Golf Course, Corner Farm and Fen Farm and Fen Farm Cottages to the south of Fen Lane.
- Agricultural fields and woodlands adjacent to the south-western boundary of the site, beyond which is a small cluster of residential properties, Ladyville Lodge Care Home and Fenlands Nursery.
- Adjacent to the far west boundary is Ockendon Road/Clay Tye Road (B186), with further residential properties beyond.
- Agricultural fields, Fairplay farm and an unnamed access road to Fairplay farm are adjacent to the north-western boundary, beyond which is Warley substation, a battery storage scheme (approximately 1.7 ha), Clay Tye Road (B186) and further residential properties.
- Bury Farm is located appropriately 250m to the north-west of the site boundary.
- The Warley substation covers an area of approximately 4.6 ha and consists of a National Grid 275 KV four-switch mesh sub-station and a UKPN 132 kV sub-station. The National Grid sub-station provides the power supplies to the UKPN sub-station. The National Grid sub-station is supplied by 2 x 275 kV circuits from Tilbury grid supply point (GSP) and Elstree GSP.

Figure 4-2: Site surroundings



4.3 Overview of the Proposed Development

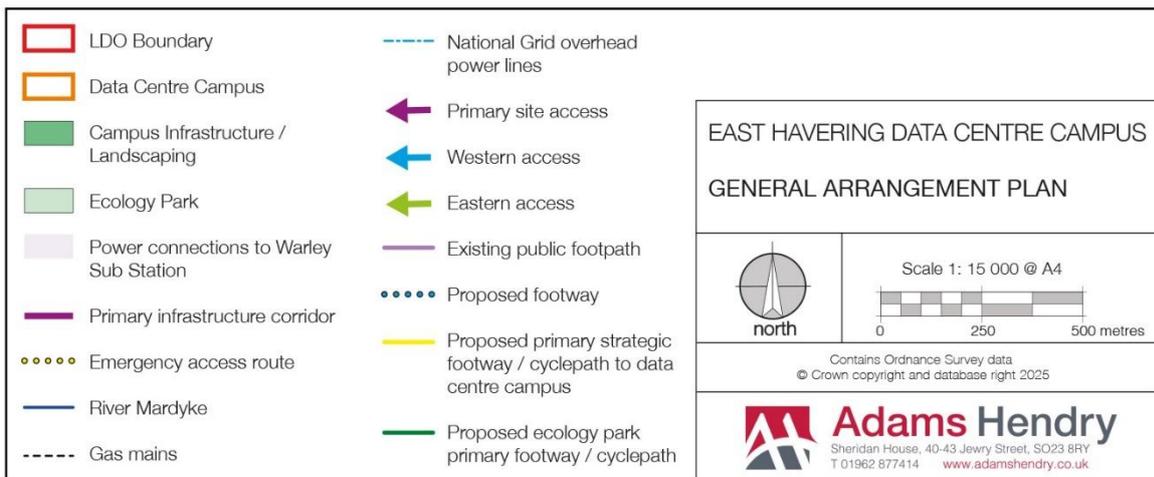
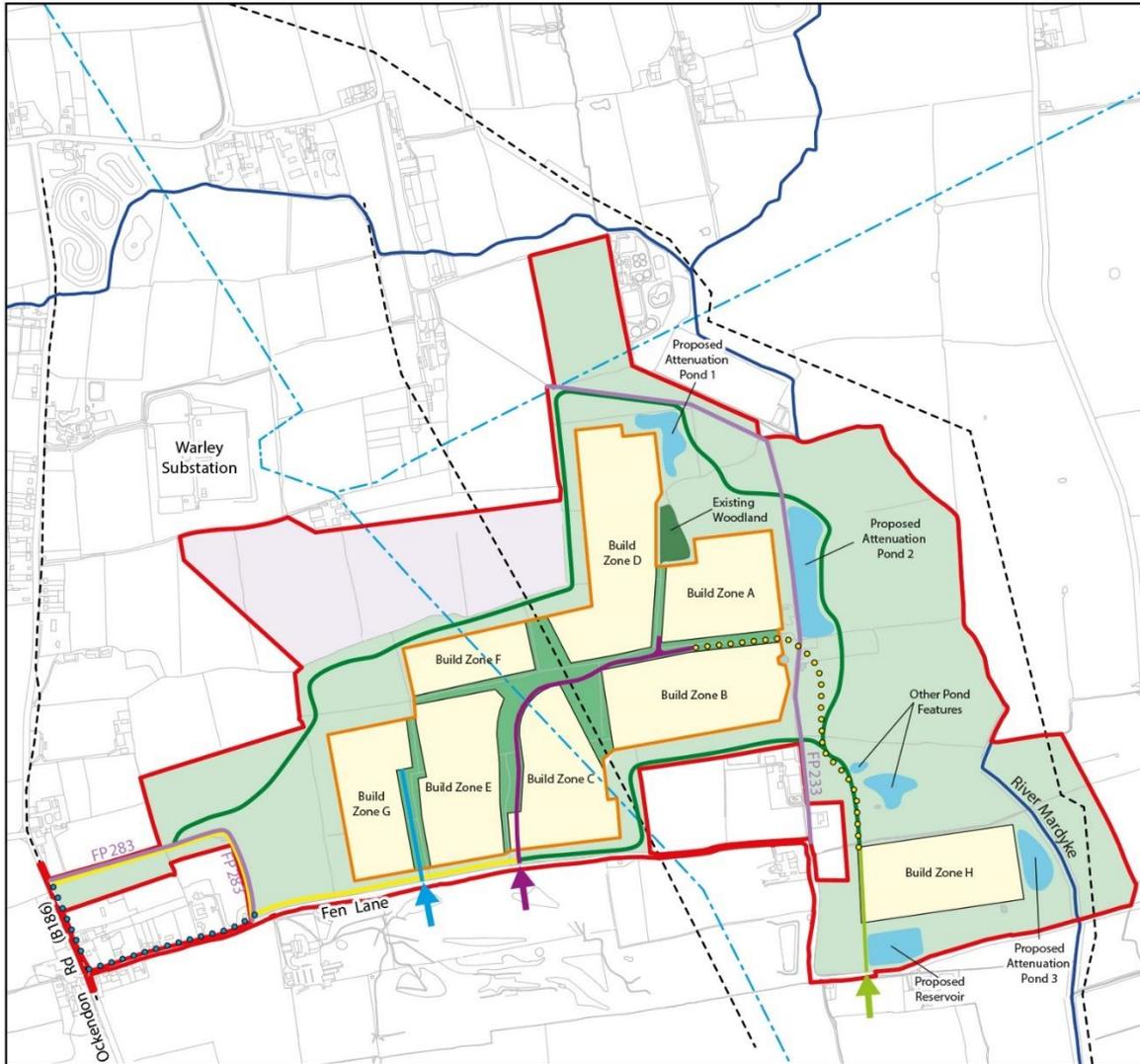
General Arrangement

Figure 4-3 below presents the general arrangement of the Proposed Development.

The data centre campus will be constructed in a series of build zones (Build Zones A – G) and enclosed within a steel security fence. The proposed build zones are included below. The LDO sets the parameters for what can be built, rather than permitting only one fixed design. The LDO essentially sets the rules for development, meaning the proposal could be brought forward in a number of different ways as long as it is compliant with the requirements of the LDO.

- **Build Zones A-F** would serve the primary infrastructure for the data centre campus and accommodate the spine road, shared cycleway and footpath, drainage swales and associated landscaping. These build zones would be accessed via the main central access road on Fen Lane located south of the Site and require a security check point.
- **Build Zone G** would also serve the primary infrastructure for the data centre campus but via a secure secondary access road to the west of the main entrance on Fen Lane, including a shared cycleway and footpath.
- **Build Zone H** would provide entry to the indoor horticulture, visitor centre and a wider network of cycleways and footpaths within the ecology park. Build Zone H would be accessed via a new eastern access road. The ecology park would extend around the whole of the secure data centre campus.

Figure 4-3: General Arrangement Plan



Site-wide Infrastructure

Table 4-1 outlines a high-level overview of the site-wide infrastructure for the Proposed Development. The table has been informed by Chapter 4 of the ES 'Proposed Development and Construction' and the draft LDO documents.

Table 4-1: Overview of site-wide infrastructure

Site-wide Infrastructure	Overview
Data Centre	<ul style="list-style-type: none"> • The Proposed Development includes up to a maximum of 400,000 m² of data centre floorspace • Each Build Zone could accommodate a number of data centre buildings ranging in size. None of the data centre buildings in any of the build zones will exceed 200m in length. • Each data centre building would be required to achieve at least BREEAM Excellent rating¹⁸ • Each data centre would be operational 24 hours a day • Each data centre plot would include a car park and cycle bays • A gated access point and small security hut would be provided for the data centre campus • Soft and hard landscaping would be provided within the data centre campus, including a buffer zone around each Build Zone comprising natural grassland and shrub planting to provide an area of transition between the plot-based development and primary and secondary infrastructure corridors and/or the wider ecology park
Campus management facilities	<ul style="list-style-type: none"> • The Proposed Development includes the provision of up to 2,700 m² of campus management facilities and up to 3,400 m² of campus security facilities • The size of the facilities would be dependent on the requirements of future occupier(s) of the Site. Should a single occupier operate and manage the whole Site, a centralised campus welfare building with facilities for employees and authorised visitors would be permitted by the LDO • Irrespective of the occupier(s), there would be a dedicated site-wide Security Control Facility (SCF) to provide oversight and management of security for the whole Site, including CCTV monitoring rooms, storage and welfare facilities, meeting rooms, offices and maintenance. This would be located at the main entrance to the data centre campus • The Campus management facilities would be required to achieve at least BREEAM Excellent rating
Indoor horticulture	<ul style="list-style-type: none"> • The Proposed Development includes the provision of up to 50,000 m² of heated horticultural facilities located within Build Zone H accessed via Fen Lane • Waste heat would be exported via an underground pipe network for use in the indoor horticulture facilities • The horticultural buildings are estimated to require over 35 million litres of water per year. Rainwater harvesting is estimated to yield between 25-30 million litres of water and could therefore meet up to 85% of demand

¹⁸ BREEAM is used to measure the sustainability performance of buildings. This framework assists projects in meeting their sustainability goals and optimal performance over time. An Excellent score more than or equal to a 70% score: [What is BREEAM | Sustainable Building Certification](#)

	<ul style="list-style-type: none"> • The greenhouses would be lit up to 20 hours a day during the winter months. During the hours of darkness, blackout screens would be provided overhead and side screens along the walls to prevent light pollution • The facility would require a small service yard for movement of goods together with the provision of employee car and cycle parking bays • The greenhouses(s) may include ancillary offices, welfare facilities and a packing and storage area
District Heating Energy Centre	<ul style="list-style-type: none"> • The Proposed Development would provide a district heating centre up to 3,300 m² • The enclosed green energy district heating centre would house all plant and machinery required to collect the waste heat from data centre buildings on the campus and distribute it to the indoor horticulture and other potential offsite heat networks in the future • The District Heating Energy Centre facilities would be required to achieve at least BREEAM Excellent rating
Electrical infrastructure	<ul style="list-style-type: none"> • New electrical infrastructure would comprise high and low voltage substations, switch rooms and other network distribution equipment located within separate fences compounds within the Build Zones and underground cable networks • A new substation within Build Zone F would connect the data centre campus to Warley substation via diverse cable routes to facilitate power to the Proposed Development • In addition, operation of the Proposed Development would require new fibre optic connections, utilising existing Openreach infrastructure. New ducts and a series of related standoff/ access chambers would be constructed to allow these connections
Ecology Park	<ul style="list-style-type: none"> • The Proposed Development would be set in an ecology park providing public access to natural landscapes incorporating wetland, grassland and meadow, wet woodland, hedgerows and permanent water bodies to provide a diverse range of habitats for national key target species The eastern area of the Site would feature wetlands and woodland along the eastern boundary. Existing and proposed woodland would wrap around the data centre campus to help screen the site from the surrounding area, while meadows would be created to break up areas of woodland to the west of the Site • Approximately 56,687 trees would be planted across the ecology park • A network of cycleways and footpaths would create access through the ecology park, including links to the data centre campus from the B186 Ockendon Road in North Ockendon. • The outer perimeter boundary of the ecology park would comprise informal post and rail gates, including wheelchair accessible kissing gates to pedestrian routes • Water for use in the greenhouses shall be drawn from a new reservoir (maximum capacity of 40,000 m³ located within the Ecology Park
Visitor Centre	<ul style="list-style-type: none"> • The Proposed Development includes the provision of space for a visitor centre within Build Zone H to accommodate 25-50 people (with a minimum GIA of 70m²). • The visitor centre would include discovery and learning facilities in association with the proposed ecology park and the ecology park management offices, welfare and storage facilities and external amenity areas • The visitor centre would be fully accessible in accordance with Part M of the Building Regulations (or as subsequently amended) • The visitor centre would have shared use of the proposed ecology park car park including car, cycle and coach parking spaces

- | | |
|--|---|
| | <ul style="list-style-type: none">• The visitor centre is expected to be open between 09:00-17:00 every day• The visitor centre would be required achieve at least BREEAM Outstanding rating |
|--|---|

Access and Parking

Figure 4-4 shows the connectivity plan for the Proposed Development, including the internal network of pedestrian and cycle paths across the Site.

There would be three fixed points of vehicles access into the Site: primary central spine road from Fen Lane; access from Fen Lane to the west of primary central spine road to serve Build Zone G; and eastern access to serve Build Zone H including the proposed ecology park and visitor centre. These three fixed access routes would also include a shared pedestrian footpath and cycleway with a minimum width of 3 metres which would extend on plot to the entrance of the proposed buildings, including the primary strategic pedestrian/ cycleway through the ecology park from the eastern access point.

To improve the connectivity of the primary strategic pedestrian footpath/ cycleway through the ecology park to the existing highway and active travel network, the following works would be completed:

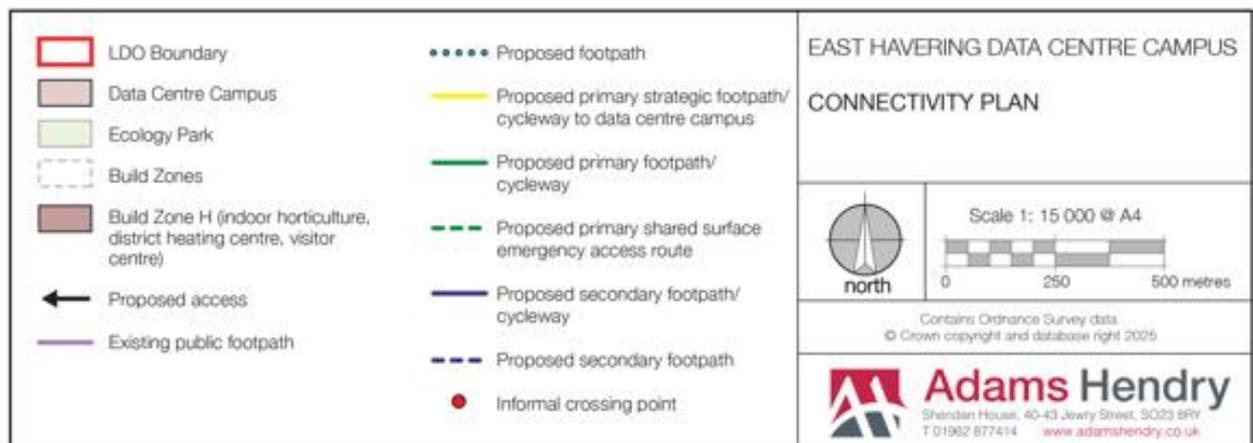
- Highway works would be carried out to provide 1.5m wide footpath on the northern side of Fen Lane between Ockendon Road and east of the Ladyville Lodge Care Home (the path may be 1.2m at pinch points). The new footpath would tie-in to the proposed primary strategic pedestrian/ cycleway through the ecology park via a new access point to the east of existing footpath 283 on Fen Lane.
- The primary strategic pedestrian footpath/ cycleway would be connected to the adjacent northbound bus stop on Ockendon Road via an informal crossing comprising a kerbed central island reservation with associated dropped kerbs and tactile paving on each side of Ockendon Road. This new central island would replace the existing traffic chicane.
- A continuous connection of the primary strategic pedestrian footpath/ cycleway to the southbound bus stop on Ockendon Road via an extension of the footway on the eastern side to the southern boundary of Fenland Nursery.

New lighting would also be provided along existing and proposed shared pedestrian footpath and cycleways along the three fixed points of access from Fen Lane, new footpaths and the entrance to the ecology park on Ockendon Road, the new proposed central island reservation and crossing points to Top Meadow Golf Course.

Emergency access would also be accommodated via the eastern access road continuing north through the ecology park to a connection point on the eastern boundary of the data centre campus, north of Build Zone B. This emergency access crosses a public right of way within the ecology park.

A minimum of 5% of the total staff/ visitor parking provision for data centre and indoor horticulture would be assigned as disabled parking spaces for Blue Badge Holders, and a minimum of 6% for the visitor centre and ecology park. The Proposed Development would also provide at least one enlarged space per plot and 4% of total staff/ visitor parking provision for the visitor centre and ecology park. These spaces are large enough to become disabled parking spaces quickly and easily via marking up of hatchings and signage.

Figure 4-4: Site Connectivity Plan



4.3 Construction

Programme

The duration of the LDO is proposed to be 20 years and therefore construction would be permitted throughout this period. However, the proposed development could be delivered within 17 years assuming the fastest reasonable programme. Based on a 17-year programme, the works are anticipated to commence in 2026 and to be completed in 2043. The indicative construction programme for key components of the Proposed Development is outlined in **Table 4-2** below in order of completion.

A more detailed breakdown of the three construction phases is available within the ***Environment Statement 'Chapter 4: Proposed Development and Construction'***

It is anticipated that the construction site will operate between 08:00 – 18:00 weekdays; 08:00 – 13:00 Saturday; and no working is to be formally undertaken on Sundays or Bank Holidays.

Table 4-2: Indicative construction programme

Proposed Development	Indicative Programme
Initial Site set up and Highway Works on Fen Lane and Ockendon Road	April 2026 – July 2026
Phase 1	
Site wide infrastructure including earthworks	July 2026 – April 2027
Electrical infrastructure on Build Zone F	July 2027 – February 2028
Data Centre uses up to 100, 000 m ² (Build Zone D)	September 2026 – November 2032
Campus Security at main site entrance	May 2027 – February 2028
Ecology Park Part 1a and Part 1 Planting	Completed by July 2028
Phase 2	
Site wide infrastructure including earthworks	November 2030 – August 3031
Data Centre uses 100, 000 – 200, 000 m ² (Build Zones E and G)	August 2031 – October 2036
Indoor Horticulture	January 2032 – October 2034
District Heating Centre	November 2032 - October 2034
Ecology Park Part 2 Planting	Completed by November 2032
Ecology Park Part 4 Planting	Completed by December 2036 (worst case)
Visitors Centre	August 2035 – October 2036
Phase 3	
Site wide infrastructure including earthworks	October 2024 – July 2035
Data centre uses 200, 000 m ² – 340, 000 m ² (Build Zones A, B and C)	July 2035 – February 2043
Campus Management Building	December 2037 – October 2038
Ecology Park Part 3 Planting	Completed by October 2036

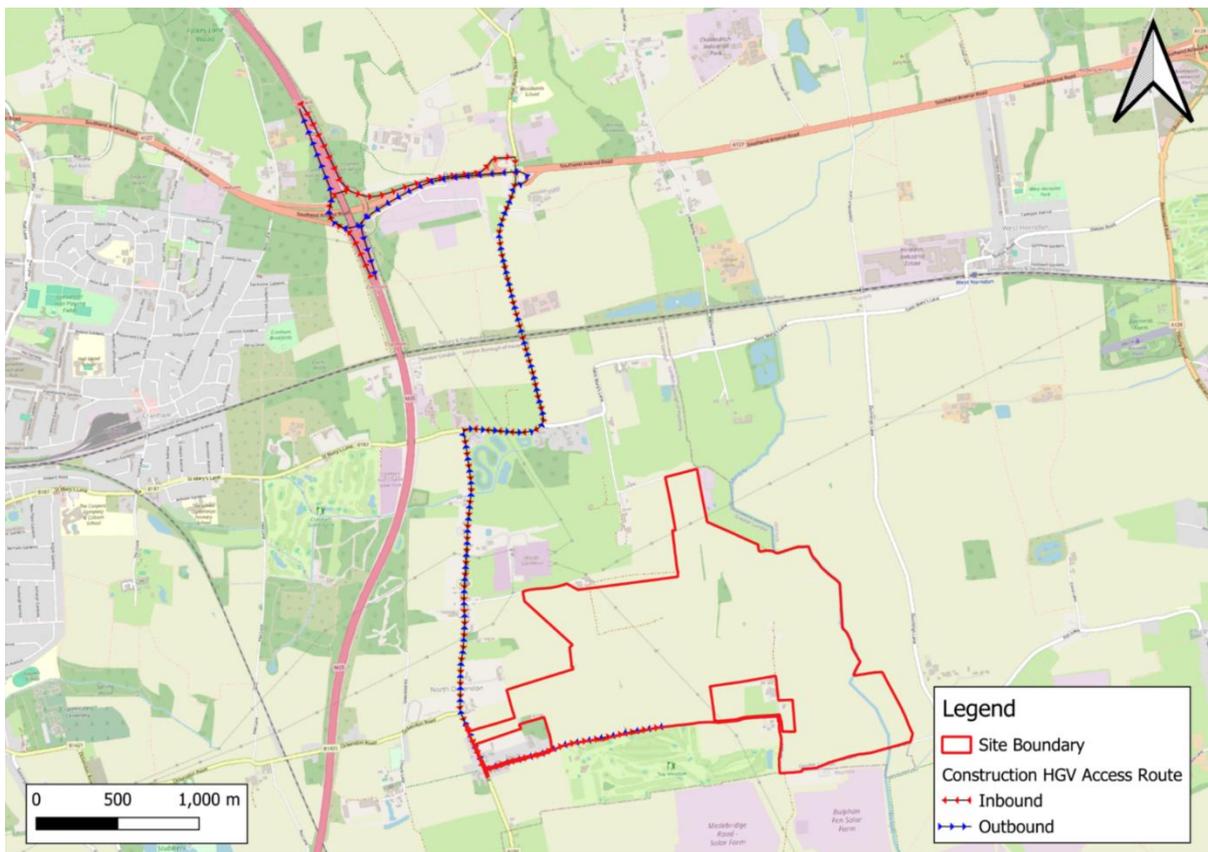
Construction traffic

The construction workforce would arrive and depart from Fen Lane via Ockendon Road or the A128. An electric shuttle bus service for construction workers would be provided to enable connection to rail and London underground services at Upminster and South Ockendon stations. The construction workforce would arrive predominantly between 06:30-08:30 and depart between 16:00-18:00.

Construction traffic comprising Heavy Goods Vehicles (HGV) would arrive from the north via the M25 (junction 29), the A127 Southend Arterial Road and Ockendon Road onto Fen Lane. The Fen Lane carriageway will be widened to a uniform width of approximately 6.2 m between the junction with Ockendon Road and the eastern site. This is required to enable two-way running for HGV traffic along Fen Lane prior to the commencement of any works on the Site. The proposed construction route for HGVs is presented in **Figure 4-5**.

Based on construction trip generation estimates, HGV arrivals and departures would occur between the hours of 06:00-18:00, with the majority of trips taking place during the operational hours of the construction site (08:00-18:00). Two-way vehicle trips generated by the Proposed Development are expected to peak in December 2035 at 1,243 two-way vehicle movements per day, of which there would be approximately 152 two-way HGV movements.

Figure 4-5 Proposed Construction Route



Construction employment

Over the construction period it is estimated that a total of 1,340 job-years of employment would be generated across the UK, including 330 annual job-years at the Borough Level.

4.4 Operation

Operational traffic

During operation, an electric shuttle bus service to/from Upminster Station would be provided to enable staff to access public transport services. The service would operate to align with the three shift patterns proposed at the data centres between 07.00-15.00, 15.00-23.00 and 23.00-07.00 daily.

A separate coach service operated directly by commercial horticultural businesses would transport horticultural workers to the site daily to align with shift patterns anticipated to be between 06.00-15.00 during the summer months and 07.30-16.30 during winter months. Indoor horticultural greenhouses would typically be operational seven days a week.

On-street parking on the public highway particularly on Fen Lane and Ockendon Road would be prohibited and measures to manage overspill parking on internal estate roads would also be in place.

4.3.1 Operational employment

Table 4-3 below outlines the estimated direct and indirect employment opportunities once operational. It is anticipated that there will be 350 direct jobs locally (in Havering). At the national level, it is anticipated that there will be approximately 1,780 direct and indirect jobs once the data centre is operational.

Table 4-3: Operational employment estimates

Effect	Havering	London (excluding Havering)	UK (excluding Havering and London)	Total
Direct employment	350	0	0	350
Indirect/induced employment	280	420	730	1,430
Total job created or sustained	620	420	730	1,780

5. Evidence Base

5.1 Introduction

This section outlines the equalities baseline relevant to the location of the Proposed Development. This includes analysis of the 2021 Census and other datasets from the Office for National Statistics (ONS). Where possible, the most recent data is presented at three geographical levels. These are, in increasing size:

- **Direct Impact Area (DIA):** comprised of the five Lower-level Super Output Areas (LSOAs) (Brentwood 008D and 009B, Thurrock 004B and 006B, and Havering 018E);
- **Wider Impact Area (WIA):** comprised of six wards Herongate, Ingrave and West Horndon Ward and Warley Ward (in Brentwood), Ockendon Ward and Orsett Ward (in Thurrock) and Cranham Ward and Upminster Ward (in Havering).
- **Local Authority:** Brentwood Council, Thurrock Council and Havering Council; and
- **Country:** England is used as a national comparison.

Data is also used from the Indices of Multiple Deprivation (IMD) to provide local insights into socioeconomic deprivation within the local area to the Proposed Development. In addition, local context is provided through the presentation of evidence on local education, skills and training, local services and sensitive receptors, the existing transport context, health and wellbeing, and key equalities issues relating to data centres.

5.2 Protected characteristics

This evidence base provides an overview of the protected characteristics that are pertinent to the Proposed Development, this includes: sex, age, disability, race, religion or belief, sexual orientation, gender reassignment, marriage and civil partnership, and pregnancy and maternity.

Understanding the demographics of the local population in relation to the protected characteristic groups enables the identification of groups within the area and how they may be impacted by the Proposed Development.

Sex

The proportion of male and female residents is similar across the geographies. Within the DIA, 49.3% of the population are male while 50.7% are female. **Table 5-1** provides a breakdown across all geographies.

Table 5-1: Sex breakdown (%) across geographies, 2021

Sex	DIA	WIA	Brentwood	Thurrock	Havering	England
Male	49.3	48.4	48.6	49.0	48.2	49.0
Female	50.7	51.6	51.4	51.0	51.8	51.0

Age

Table 5-2 provides a breakdown of the ages of the population for all geographies. In the DIA and WIA, 20.8% and 20.0% of the respective populations are over the age of 65 which is slightly higher than the national figure (18.4%) and surrounding local authorities of Thurrock (13.6%) and Havering (17.6%).

A similar proportion of the DIA and WIA populations are aged 0-15 (18.3% and 18.9% respectively) compared to the national figure (18.6%), while Thurrock and Havering have a slightly higher percentage (22.5% and 20% respectively). In terms of the working age population (aged 16-64), the DIA and WIA have the lowest representation (60.8% and 61.1% respectively).

Table 5-2 Age breakdown (%) across geographies, 2021

Age	DIA	WIA	Brentwood	Thurrock	Havering	England
0-15	18.3	18.9	18.4	22.5	20.0	18.6
16-64	60.8	61.1	61.4	63.9	62.4	63.1
65+	20.8	20.0	20.2	13.6	17.6	18.4

Disability

A smaller proportion of the DIA and WIA populations have a disability (15.8% and 14.0% respectively) compared to England as a whole (17.3%). The figures for Brentwood, Thurrock and Havering are also lower than the figure for England.

Table 5-3 Disability or long-term health condition & breakdown across geographies, 2021

Disability	DIA	WIA	Brentwood	Thurrock	Havering	England
Disabled under Equality Act (daily activities limited 'a lot')	6.4	5.6	5.7	6.1	6.3	7.3
Disabled under Equality Act (daily activities limited 'a little')	9.4	8.4	8.4	8.4	8.3	10.0
Not disabled under Equality Act (has long term health condition but daily activities not limited)	6.4	6.4	6.8	5.5	5.7	6.8
Not disabled under Equality Act and no long-term conditions	79.2	79.6	80.1	79.2	79.6	75.9

Ethnic group

A larger proportion of the DIA and the WIA are White British (82.2% and 80.2%) compared to England as a whole (73.5%). A slightly larger proportion of the DIA are Gypsy or Irish Traveller (0.3%) compared to the average across England (0.1%). There are no formal traveller sites in Havering, however, the Havering Local Plan Gypsy and Traveller Position Statement in 2017¹⁹ identified Tyas Stud Farm rear of Latchford Farm as a site as the occupants meet the planning definition of a Traveller. This site is located in close proximity to the Proposed Development to the north of St Marys Lane.

A smaller percentage of the DIA and WIA population belong to minority ethnic groups compared to national figures. However, the largest minority ethnic groups in the DIA and WIA are Indian (2.3% and 2.1% compared to 3.3% nationally) and African (2.5% and 3.1% compared to 2.6% nationally).

¹⁹ Havering London borough Cabinet Meeting (2017) Havering Local Plan Gypsy and Traveller Position Statement 2017. Available at: <https://democracy.havering.gov.uk/documents/s24078/Annex%2024%20-%20Gypsy%20and%20Traveller%20Position%20Statement.pdf>

Across the local authorities, there is a relatively larger African population in Thurrock (9.2%) and Havering (5.4%) which is higher than the national average (2.6%). In Thurrock, 9.6% of the population are 'Other White' along with 7.4% in Havering which is slightly higher than England (6.3%).

Table 5-4 Ethnic group % breakdown across geographies, 2021

Ethnic Group	DIA	WIA	Brentwood	Thurrock	Havering	England
White						
English, Welsh, Scottish, Northern Irish or British	82.2	80.2	82.7	66.2	66.5	73.5
Irish	1.1	1.2	1.3	0.6	1.1	0.9
Gypsy or Irish Traveller	0.3	0.2	0.1	0.2	0.1	0.1
Roma	<0.1	0.1	0.1	0.2	0.2	0.2
Other White	4.6	5.0	4.3	9.6	7.4	6.3
Asian, Asian British or Asian Welsh						
Bangladeshi	0.3	0.6	0.4	1.4	1.8	1.1
Chinese	0.5	0.7	0.7	0.6	0.8	0.8
Indian	2.3	2.1	2.6	2.3	4.3	3.3
Pakistani	0.7	0.6	0.3	1.2	2.2	2.8
Other Asian	0.7	1.0	1.1	1.5	1.7	1.7
Black, Black British, Black Welsh, Caribbean or African						
African	2.5	3.4	1.5	9.2	5.4	2.6
Caribbean	0.5	0.7	0.5	1.2	1.8	1.1
Other Black	0.7	0.6	0.3	1.4	1.0	0.5
Mixed or Multiple Ethnic Groups						
White and Asian	0.8	0.9	1.0	0.6	0.9	0.8
White and Black African	0.5	0.5	0.4	0.6	0.6	0.4
White and Black Caribbean	0.9	0.8	0.8	1.0	1.2	0.9
Other Mixed or Multiple ethnic groups	0.5	0.7	0.8	0.8	1.0	0.8
Other ethnic group						
Arab	0.1	0.1	0.2	0.2	0.3	0.6
Any other ethnic group	0.6	0.8	0.9	1.3	1.7	1.6

Religion

Across all geographies, the most common religious group is Christian. In the DIA, 55.5% of the population are Christian and in the WIA, 57.4% of the population are Christian which is higher than the figure for England (46.3%). Across the local authorities, there is also a large proportion of Christians (56% in Brentwood, 51.7% in Thurrock and 52.2% in Havering).

The largest minority religious group in the DIA and WIA is Muslim (2.0% of the DIA and 2.3% of the WIA). However, this is lower than the national figure (6.7%). In Thurrock, 4.9% of the population are Muslim, and in Havering, 6.2% of the population are Muslim.

Table 5-5 Religion % breakdown across geographies, 2021

Religion	DIA	WIA	Brentwood	Thurrock	Havering	England
No religion	33.7	32.1	33.3	34.7	30.6	36.7
Christian	55.5	57.4	56.0	51.7	52.2	46.3
Buddhist	0.8	0.4	0.4	0.4	0.4	0.5
Hindu	1.3	1.3	1.8	1.4	2.5	1.8
Jewish	0.4	0.3	0.4	0.1	0.5	0.5
Muslim	2.0	2.3	1.6	4.9	6.2	6.7
Sikh	0.6	0.6	0.5	1.2	1.7	0.9
Other religion	0.1	0.4	0.5	0.5	0.4	0.6
Not answered	5.9	5.3	5.6	5.2	5.5	6.0

Pregnancy and maternity

The total fertility rate (TFR) was slightly higher for the three local authorities of Brentwood (1.65), Thurrock (1.62) and Havering (1.64) compared to England (1.41)²⁰. In 2024, there was a crude birth rate (CBR) of 9.6 in England (594,677 births). The CBR was higher in Brentwood at 11.3 (894 births)²¹. In 2024, there were 1,717 births in Havering and 1,034 in Thurrock, although CBRs are not available²².

5.3 Socio-economic disadvantage

The socio-economic profile considers several factors including levels of deprivation, employment, education, health, housing, transport, and connectivity; as well as access to services and facilities; public realm and open space; safety, security and well-being; and community cohesion. These factors are pertinent to those with protected characteristics and inequality and, as such, provide additional baseline information relevant to the assessment of equality impacts.

Index of Multiple Deprivation (IMD)

Deprivation is measured by the 2025 English Indices of Deprivation.²³ This provides an overall deprivation score and rank for 33,755 LSOAs across England by building upon seven distinct 'domains' of deprivation:

- Income - measures the proportion of the population experiencing deprivation relating to low income. The definition of low income used includes both those people that are out of work, and those that are in work but who have low earnings.
- Employment - measures the proportion of the working age population in an area involuntarily excluded from the labour market. This includes people who would like to

²⁰ ONS (2025) Births in England and Wales. Available at: [Births in England and Wales - Office for National Statistics](#)

²¹ ONS (2025) Births in England and Wales: birth registrations. Available at: [Births in England and Wales: birth registrations - Office for National Statistics](#)

²² ONS (2025) Births in England and Wales: birth registrations. Available at: [Births in England and Wales: birth registrations - Office for National Statistics](#)

²³ Ministry of Housing, Communities and Local Government (2025) English indices of deprivation 2025: English indices of deprivation 2025: statistical release. Available at: [English indices of deprivation 2025: statistical release - GOV.UK](#)

work, but are unable to do so due to unemployment, sickness or disability, or caring responsibilities.

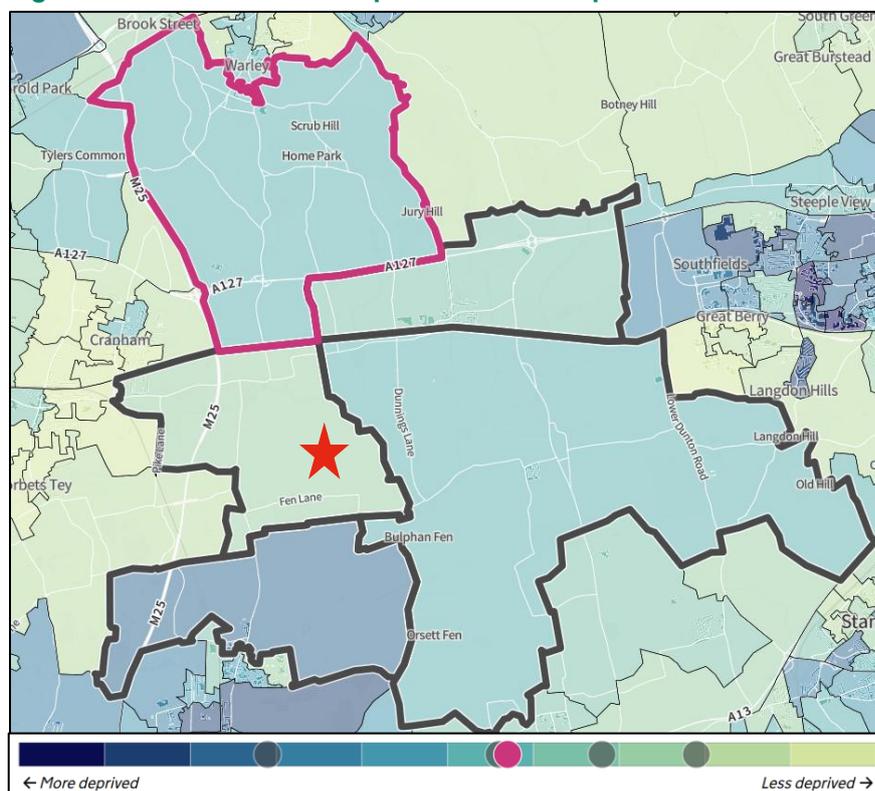
- Education, skills, and training – measures the lack of attainment and skills in the local population.
- Health deprivation and disability – measures the risk of premature death and the impairment of quality of life through poor physical and mental health.
- Crime – measures the risk of personal and material victimisation at a local level.
- Barriers to housing and services – measures the physical and financial accessibility of housing and local services.
- Living environment – measures the quality of the local environment.

The overall IMD score generated by the combination of these domains provides a rank for all the LSOAs, rank 1 being the most deprived LSOA in England, and a rank of 33,755 being the least deprived LSOA in England. For ease of comparison, this socio-economic profile uses the respective decile ranking of the LSOA; a decile ranking of 1 means that the LSOA is in the top 10% most deprived nationally, and a decile ranking of 10 means it is in the 10% least deprived nationally.

The scores provided against each domain are a measure of relative deprivation rather than affluence. As such, it is important to recognise that not every person in a deprived area will themselves be deprived and likewise, that there will be some deprived people living in the least deprived areas.

Figure 5-1 presents a map of the DIA (central point of the Proposed Development is marked by the red star). The map highlights that area local to the Proposed Development experiences low levels of deprivation.²⁴ Thurrock 006B was ranked in the 30% most deprived LSOAs in England while the remaining three LSOAs in the DIA were ranked in the 20-50% least deprived.

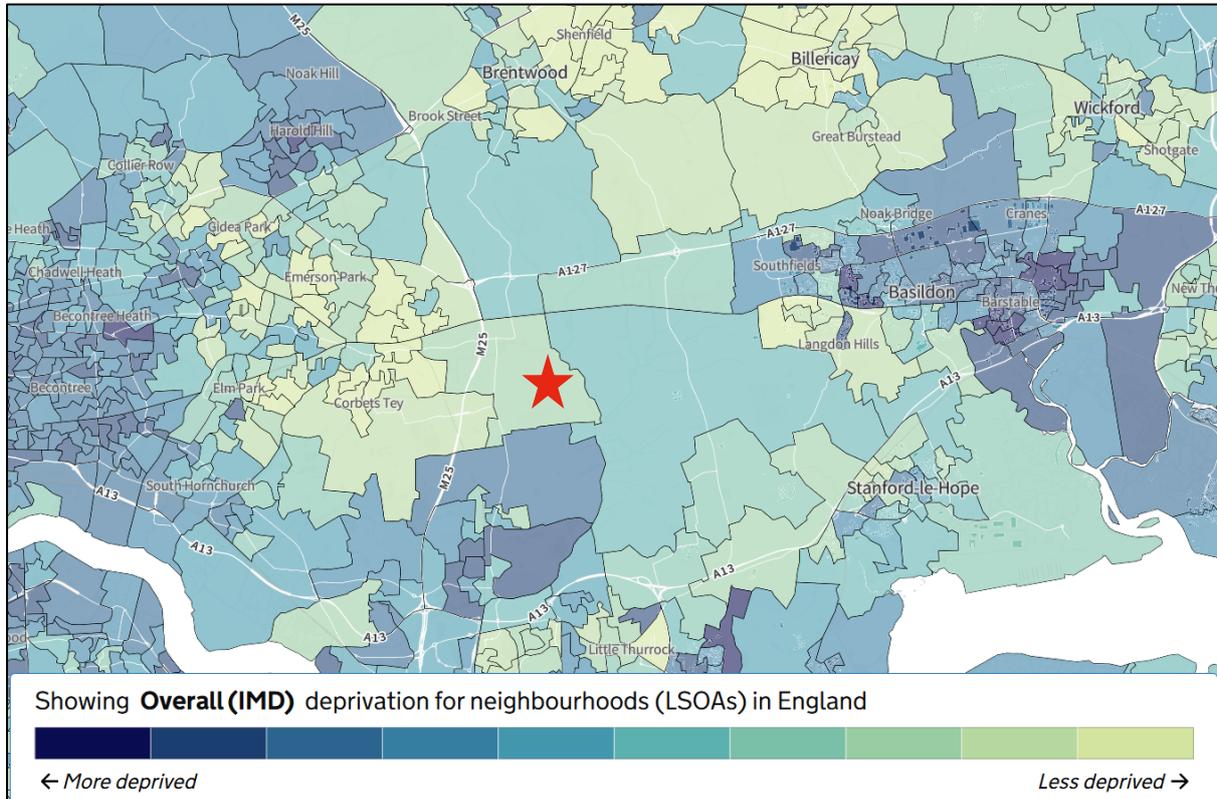
Figure 5-1: IMD Overview map of the Direct Impact Area



²⁴ Ministry of Housing, Communities and Local Government (2025). English indices of deprivation 2025: Maps. Available at: [Health & Disability | Local Deprivation Explorer](https://www.gov.uk/government/collections/english-indices-of-deprivation-2025-maps)

Figure 5-2 presents an overview of the IMD in the WIA (the approximate location of the Proposed Development marked by the red star). While the rural area surrounding the Proposed Development experience low levels of deprivation, the urban areas in the wider vicinity and in closer proximity to Greater London experience greater levels of deprivation. This includes Dagenham and East London to the East, Basildon to the West, and South Ockenden to the South.

Figure 5-2: IMD Overview map of the Wider Impact Area



Income

The prevalence of income deprivation is also relatively low across the DIA. Thurrock 006B was ranked in the 30% most deprived LSOAs in England – more deprived than 74% of neighbourhoods. Brentwood 008D was ranked in the 50% least deprived LSOAs in England, while the remaining three LSOAs were ranked in the 20% least deprived.

The median annual gross income for all employees was highest in Brentwood at £43,504, followed by Havering at £39,002, while Thurrock had the lowest median income at £35,346.²⁵ However, all three local authorities sit above the national median of £31,840.

At the local authority level, the number of children living in relative poverty²⁶ has been steadily increasing across all geographies between 2020/21-2023/24.²⁷ Based on the population of children (under 16) recorded in the 2021 Census, Thurrock has the highest prevalence of children living in low income families at 20.8%, compared to Havering at 16.2% and Brentwood with the lowest prevalence of 12.2%. However, these sit below the national average of 23.9%.

²⁵ Earnings Team (2024). Earnings and hours worked, place of residence by local authority: ASHE Table 8.7a. Available at: [Earnings and hours worked, place of residence by local authority: ASHE Table 8 - Office for National Statistics](#)

²⁶ Relative low-income is defined as a family whose equivalised income is below 60 per cent of contemporary median income. Gross income measure is Before Housing Costs (BHC) and includes contributions from earnings, state support and pensions.

²⁷ Department for Work and Pensions (2025). Children in low income families: local area statistics. Available at: [Children in low income families: local area statistics - GOV.UK](#)

Employment

Similarly to the IMD and income, there are low levels of employment deprivation across the DIA. Thurrock 006B was the most deprived LSOA in the DIA - ranking in the 40% most deprived nationally – while the remaining four LSOAs ranked in the 10-50% least deprived.

Census 2021 data in **Table 5-6** indicates that economic activity across the local and wider geographies sits above the national average, in particular Thurrock has the highest levels of economic activity (64.4%). Consequently, the percentage of full-time students and economically inactive are similar levels across the other geographies and sit lower than England.

Table 5-6: Economic activity status (%) by geographical area, 2021²⁸

Status	DIA	WIA	Brentwood	Thurrock	Havering	England
Economically active (excluding full-time students)	60.8	61.5	61.5	64.4	61.3	58.6
Economically active and a full-time student	1.4	1.5	1.3	2.5	1.9	2.3
Economically inactive	37.9	37.0	37.2	33.2	36.9	39.1

In terms of occupation, professional occupations comprise the majority of jobs across all geographies. This includes a range of sectors including engineering, environmental, research and development, medical, legal and financial professionals. These may comprise some of the specialist roles employed in the operational data centres. The WIA (20.7%) and Brentwood (23.5%) sit above the national average of 20.3%, while the DIA has a lower representation of these occupations (17.7%).

Of further interest to the Proposed Development are construction occupations within the skilled trades occupations. The DIA (11.4%) and Havering (11.5%) have the highest proportions of these occupations, sitting above the national average (10.2%).

Figure 5-7: Occupation (%) by geographical area, 2021²⁹

Occupation	DIA	WIA	Brentwood	Thurrock	Havering	England
Managers, directors and senior officials	17.0	15.7	18.5	11.0	12.4	12.9
Professional occupations	17.7	20.7	23.5	14.6	19.5	20.3
Associate professional and technical occupations	14.3	15.0	16.0	11.3	13.4	13.3
Administrative and secretarial occupations	14.5	14.0	12.2	11.9	13.4	9.3
Skilled trades occupations	11.4	10.1	8.6	11.2	11.5	10.2

²⁸ ONS (2021) Census 2021: TS066 – Economic activity status. Available at: <https://www.nomisweb.co.uk/query/select/getdatasetbytheme.asp?opt=3&theme=&subgrp=>

²⁹ ONS (2021) Census 2021: TS063 – Occupation. Available at: <https://www.nomisweb.co.uk/query/select/getdatasetbytheme.asp?opt=3&theme=&subgrp=>

Caring, leisure and other service occupations	7.2	6.8	6.7	8.4	8.2	9.3
Sales and customer service occupations	6.2	5.8	5.0	8.2	6.5	7.5
Process, plant and machine operatives	5.8	5.3	3.9	10.0	6.5	6.9
Elementary occupations	5.9	6.7	5.6	13.4	8.2	10.5

Education, skills and training

There is some prevalence of educational deprivation across the DIA compared to other IMD domains. Thurrock 006B and 004B are ranked in the 40% most deprived neighbourhoods nationally in terms of education, skill, and training deprivation. The remaining LSOAs ranked in the 40-50% least deprived. However, the higher representation of older residents may have lower qualifications, contributing to these higher education deprivation scores³⁰.

These rankings are reflected in **Table 5-7** with Thurrock indicating the largest proportion of residents with no qualifications (21.6%). Contrastingly, Brentwood has the lowest proportion of residents with no qualifications (15.1%) and highest proportion with Level 4 qualifications (35.4%) and the WIA has similar proportions of Level 4 qualifications at 31.2%.

Table 5-7: Educational attainment (%) by geographical area, 2021³¹

Qualification	DIA	WIA	Brentwood	Thurrock	Havering	England
No qualifications	19.4	17.1	15.1	21.6	20.0	18.1
Level 1 and entry level qualifications	11.4	11.0	9.7	12.2	11.2	9.7
Level 2 qualifications	15.4	15.9	15.4	15.6	14.9	13.3
Apprenticeships	5.6	4.8	4.7	5.0	5.1	5.3
Level 3 qualifications	16.8	17.2	17.2	16.2	16.3	16.9
Level 4 qualifications	28.6	31.2	35.4	26.2	29.5	33.9
Other qualifications	2.8	2.8	2.6	3.2	3.0	2.8

Health

The DIA experiences low levels of health deprivation, with Thurrock 006B ranked in the 50% most deprived nationally while remaining LSOAs are ranked in the 20-50% least deprived.

These rankings are reflected in the Census data presented in **Table 5-8**, with the largest proportion of residents ranking general health as 'very good' across the geographies. While

³⁰ Trust for London (2019). Comparing the Index of Multiple Deprivation with its Education Domain. Available at: [Comparing the Index of Multiple Deprivation with its Education Domain | Trust for London](#)

³¹ ONS (2021) Census 2021: TS067 – Highest level of qualification. Available at: <https://www.nomisweb.co.uk/query/construct/submit.asp?forward=yes&menuopt=201&subcomp=>

Havering has the lowest proportion with 'very good health' (49.9%) locally, the DIA represents the largest percentage with 'bad' or 'very bad' health (4.8%).

Table 5-8: General health rating by geographical area (%), 2021³²

Rating	DIA	WIA	Brentwood	Thurrock	Havering	England
Very good health	50.6	52.6	54.0	50.8	49.9	48.5
Good health	32.6	32.8	31.7	33.3	34.0	33.7
Fair health	12.0	10.9	10.6	11.5	11.7	12.7
Bad health	3.7	2.9	2.9	3.4	3.4	4.0
Very bad health	1.1	0.9	0.9	1.0	1.0	1.2

Thurrock and Havering sit below the national average for the percentage of the adult population meet the recommended levels of physical activity³³, at 57.2% in Thurrock, 57% in Havering and 67.4% nationally.³⁴ However, the residents of Brentwood sit above the national average with 70.6% of adults achieving the recommended physical activity levels.

This aligns with the prevalence of obesity in adults (aged 18+). Brentwood has the lowest proportion of adults with obesity (61.6%) compared to Thurrock (68.7%) and Havering (65.8%).³⁵ Brentwood also sits below the national average of 64.5%, while the other local authorities are overrepresented.

The standardised mortality rate from Cardiovascular disease for those under 75 is highest in Thurrock at 76.9 per 100,000 and lowest in Brentwood (67 per 100,000).³⁶ In Havering, the mortality rate is 69.6 per 100,000. All three local authority areas sit below the national average of 77.4 per 100,000.

5.4 Local services and amenities

Leisure facilities and green spaces:

- To the south of Fen Lane is the Top Meadow Golf Course, Top Meadow Hotel and Top Meadow Golf Course Driving Range.
- Glass House Retreat and Fen Farm lodgings are also located further east along Fen Lane. Berry Lodge Farmhouse is located to the north of the Scheme on St Marys Lane.
- The Thames Chase Forest Centre and Cranham Golf Course are located just south of the Scheme on the south side of the M25. The Fanatic Aquatic Design (Aquarium) and The Reptile Reserve are located on the east side of the M25, just to the South of the Scheme.
- Cranham Brickfields Open Space and Local Nature Reserve are located to the north of Cranham Golf Course.

³² ONS (2021) Census 2021: TS037 – General health. Available at:

<https://www.nomisweb.co.uk/query/construct/summary.asp?mode=construct&version=0&dataset=2055>

³³ The number of respondents aged 19 and over, with valid responses to questions on physical activity, doing at least 150 moderate intensity equivalent (MIE) minutes physical activity per week in bouts of 10 minutes or more in the previous 28 days expressed as a percentage of the total number of respondents aged 19 and over.

³⁴ Department of Health and Social Care (2025). Local Authority Health Profiles. Available at: [Local Authority Health Profiles | Fingertips | Department of Health and Social Care](#) [accessed 30/05/2025].

³⁵ Department of Health and Social Care (2025). Local Authority Health Profiles. Available at: [Local Authority Health Profiles | Fingertips | Department of Health and Social Care](#) [accessed 30/05/2025].

³⁶ Department of Health and Social Care (2025). Local Authority Health Profiles. Available at: [Local Authority Health Profiles | Fingertips | Department of Health and Social Care](#) [accessed 30/05/2025].

- There are several other golf courses, green spaces and leisure facilities in the wider surrounding areas, including Langdon Hills Golf Country Club and Hotel, Westly Heights Country Park, Northlands Wood Country Park, Langdon Hills Country Park, Basildon Golf Course, Langdon Nature Discovery Park and Dunton Hills Family Golf Centre to the east of the Scheme.
- Orsett Golf Course, St Cleres Hall Golf Club, Lorkins Farm Caravan and Camping Site, Mardyke Valley Golf Club, Well Dog Field, Thurrock Rugby Football Club, Belhus Woods Country Park, Stubbers Adventure Centre, Ingrebourn and Links Golf and Country Club, and Hornchurch Country Park are located to the south and east of the Scheme.
- Thurrock Airfield is located to the southeast of the Scheme and Adventure 001 Helicopter flights is located to the southwest.

Schools and nurseries:

- Fenlands Nursery is located in close proximity of the Scheme in North Ockendon.
- Thames Chase Community Tree Nursery is located to the east of the Scheme on the edge of Upminster.
- Quince Tree Day Nursery and Headstart Nursery 2 are located in South Ockendon along with several schools including Benyon Primary, Bonnygate Primary, Harris Academy Ockendon, Beacon Hill Academy, Shaw Primary Academy, Holy Cross Catholic Primary, Harris Academy Ockendon (secondary school) and Sixth Form, and Somers Health Primary School.
- William Edwards School and Orsett Church of England Primary School are located to the south of the Scheme.
- Bulphan CofE Academy and Acorns Pre-School and Bulphan are located in close proximity to the Scheme in Bulphan.
- There are multiple schools to the east of the Scheme in Upminster and Hornchurch. The closest schools to the east are The James Oglethorpe Primary, Gaynes School, Corbets Tay School, Oakfield's Preparatory School, The Coopers Company and Coborn School (secondary school), Upminster Infant School and Hall Mead School.
- Woodlands Preparatory School is located just north of the Scheme.
- There are multiple schools and nurseries located in Brentwood to the north, Laindon and Basildon to the East, Little Thurrock and North Ockendon to the South.

Healthcare and age facilities:

- Upminster Nursing Home is located on Clay Tye Road to the west of the Scheme and Ladyville Lodge Care Home is located on Fen Lane.
- Holmes Care Ltd (care home) is located on Cranham Court to the east of the Scheme.
- The Peartree Surgery (GP) is located in South Ockendon.
- The Haiderian Medical Centre, Little Gaynes Surgery, Rainham and Upminster Medical Centre, Cranham Village Surgery, Haiderian Medical Centre, Cranham Health Centre and Avon Road Surgery in Upminster are located to the north east of the Scheme.

- Orsett Hospital and South Essex Partnership NHS Foundation Trust are hospitals located to the South of the Scheme, with Basildon hospital located to the East.

5.5 Existing transport access and servicing

The DIA benefits from local and regional transport connectivity, situated less than 1 kilometre from the London Orbital Motorway (M25) providing access to the national motorway network. The M25 runs to the west of the site, with its closest point just 900 metres away. Direct access is available via Fen Lane to the south of the site, which links to Junction 29 of the M25 through the B186/B187 and the A127. The A127 itself lies approximately 1.9 kilometres north of the site boundary, offering an additional strategic route.

Further, the site is located within the Thames Freeport economic zone, which offers multimodal connectivity across the UK and Europe. The Freeport provides access ports in international markets and serves a large consumer base within a 120-kilometre radius, enhancing the site's appeal for logistics and distribution operations.

5.5.1 Public and active travel network

There are a number of train stations surrounding the Site, connecting suburban towns, villages and settlements to the wider transport network. This includes West Horndon Station to the north, Laindon Station to the east, Ockendon to the south and Upminster to the west.

The London public transport network offers connections to the nearby area. Upminster Bridge, Hornchurch and Elm Park Underground Stations served by the District Line and Emerson Park Overground Station served by the Liberty Line is also located to the West of the Site.

The Site is also intersected by the following Public Rights of Way (PRoW):

- Footpath 233 from Fen Lane to Bury Farm which crosses through the centre of the site; and
- Footpath 283 from Fen Lane to Ockendon Road which crosses the western most confines of the site.

5.5.2 Travel to work

Table 5-9 provides a breakdown of method used to travel to work across the geographies. As shown, a slightly larger proportion of the DIA (36.4%) and the WIA (39.5%) work from home compared to England as a whole (31.5%). A smaller proportion of the DIA and WIA cycle or walk to work compared to England as a whole, whilst larger proportions (7.1% in the DIA and 7.4% in the WIA) use the train to get to work compared to England (2%). A similar proportion of the DIA drive a car or van to work (43.7%) compared to England (44.5%), whilst this figure is lower for the WIA (38.8%).

Table 5-9 Travel to work method across geographies, 2021

Travel to work	DIA	WIA	Brentwood	Thurrock	Havering	England
Work mainly at or from home	36.4	39.5	44.3	24.5	33.4	31.5
Underground, metro, light rail, tram	2.2	3.2	1.4	2.3	6.7	1.9
Train	7.1	7.4	6.5	7.0	7.0	2.0
Bus, minibus or coach	1.3	2.0	1.0	3.0	5.6	4.3

Taxi	0.4	0.5	0.5	0.6	0.6	0.7
Motorcycle. Scooter, or moped	0.4	0.5	0.3	0.65	0.5	0.5
Driving a car or van	43.7	38.8	37.4	50.3	36.8	44.5
Passenger in car or van	2.5	2.4	2.3	4.1	2.7	3.9
Bicycle	0.6	0.5	0.5	1.2	0.7	2.1
On foot	4.0	4.1	4.8	5.1	4.9	7.6
Other method of travel to work	1.4	1.1	1.0	1.2	1.2	1.0

5.6 Summary of key issues

- A larger proportion of residents living within the DIA and WIA of the Proposed Development are over the age of 65 compared to the average in England.
- While there are relatively low levels of overall deprivation across the DIA and WIA, this increases in wider urban areas and LSOAs in closer proximity to Greater London.
- A slightly higher proportion of the populations in the DIA and WIA are 'economically active' compared to England as a whole. However, the number of children living in relative poverty has been steadily increasing across the local authorities between 2020/21 and 2023/24. The highest proportion of children living in low-income families is in Thurrock (20.8%).
- In the DIA and WIA, the most common occupations include: managers, directors and senior officials, professional occupations, associate professional and technical occupations, and administrative and secretarial occupations.
- Population health in the DIA and WIA is slightly higher on average than England with larger proportions of residents reporting their health as 'very good' and 'good'. A slightly smaller proportion of the DIA and WIA (15.8% and 14%) have a disability that impacts activity compared to the national figure (17.3%).
- There are several leisure facilities and green spaces in proximity to the Proposed Development, including golf courses, sports clubs, parks and hotel accommodation. There are also schools, nurseries and health and age care facilities located in proximity.
- Within the DIA and WIA, the most common mode of transport to travel to work is driving a car or van, although the figures were slightly lower than the national average. The second most popular method was travelling by train, with the figures across all study geographies higher than the national average. A larger proportion of the DIA and WIA work from home compared to England as a whole.

6. Consultation and Engagement

6.1 Introduction

This section provides an overview of engagement activities undertaken to date. Digital Reef Ltd (the potential beneficiary of the LDO) and the Council’s Economic Development Team have undertaken **informal engagement** to inform the local community about the proposal. This engagement was not by the LPA and was independent from the statutory consultation that will be undertaken by the LPA on the draft LDO. The LPA will carry out **formal consultation**, in accordance with planning regulations which will provide residents and stakeholders the opportunity to formally comment on the draft LDO.

6.2 Community engagement

Table 6-1 below outlines engagement activities undertaken by the potential beneficiary of the LDO and the Havering Council’s Economic Development Team to engage local residents.

Table 6-1: Overview of community engagement activities undertaken to date

Overview of community engagement	
Digital Reef	<p>The potential beneficiary of the LDO has undertaken a series of informal engagement activities within the local community to inform near neighbours about the data centre proposals, including:</p> <ul style="list-style-type: none"> • Attendance to local schools and business events; • Developed a dedicated website that includes details of the Proposed Development³⁷; and • Visualisation tool of the Proposed Development.
Havering Council Economic Development Team	<p>On Monday 29th July 2025, the Leader of Havering Council met with local residents to discuss the proposed data centre, including the delivery of local growth, new businesses and job opportunities.³⁸</p> <p>Residents were advised that the Council will continually work with the local community to secure the maximum benefits for local residents and Havering as a whole.</p>

6.3 Consultation on draft LDO

The LPA is undertaking a formal consultation period in Spring 2026 to seek feedback on the draft LDO from members of the public and statutory stakeholders.

Consultees will be provided with consultation documents including the Draft LDO and compliance documents (such as the Design Code and Code of Construction Practice), Statement of Reasons, Environmental Statement, Health Impact Assessment, and EqIA as well as a number of other planning and technical document.

³⁷ Digital Reef (2025). East Havering Data Centre Campus. Available at: [Our Proposal — East Havering Data Centre](#) [accessed: 27/11/25]

³⁸ East Havering Council (2024). Leader’s Statement following the proposed East Havering datacentre neighbours meeting. Available at: [Leader’s Statement following the proposed East Havering datacentre neighbours meeting | London Borough of Havering](#)

When the consultation is launched, local residents will be notified letter drops in local area, the Living in Havering Newsletter, site notices in the local area, publications on social media and a statutory notice in local newspapers. There will also be a dedicated website for consultation documents and printed copies of the key consultation documents at Havering Town Hall and Upminster library

All consultation procedures will be in line with the Town and Country Planning regulations including the minimum consultation period, availability of documents and consultation with prescribed bodies.

The LPA are planning to hold two public engagement events and stakeholder event, mainly for statutory consultees outlined in the Development Management Procedure Order (2015) including the Greater London Authority, Environment Agency and Historic England among others.³⁹

³⁹ UK Government (2015). Town and Country Planning: Development Management Procedure (England) Order 2015. Available at: [The Town and Country Planning \(Development Management Procedure\) \(England\) Order 2015](#)

7. Assessment of equality impacts

7.1 Introduction

The assessment of equality effects considers the potential impacts on affected people sharing protected characteristics arising from the Proposed Development and associated ecology park. It considers the beneficial and adverse construction impacts on protected characteristic groups; and beneficial and adverse operational impacts on protected characteristic groups.

Table 7-1: Overview of potential equality impacts

Potential Impact	Key groups affected	Description of effects	Planned and further actions
Jobs, skills and training			
Beneficial	New employment opportunities during construction	<p>All groups, in particular young people, minority ethnic groups, people with disabilities, lower-income households</p> <p>The Proposed Development creates an opportunity for new employment opportunities including construction-related jobs. Construction employment could cover entry-level jobs, skilled trades and technical and specialised roles; including professional and construction occupations that are overrepresented in the DIA and WIA.</p> <p>The Proposed Development is estimated to create 1,340 construction-related job-years over the construction period, including 330 annual job-years across Havering Borough. The groups who benefit from this new employment may vary depending on the type of jobs and skills available. For example, creation of temporary job opportunities may benefit protected characteristic groups overrepresented in unemployment or individuals who face barriers to entering or re-entering the labour market, such as young people, disabled people, women, older workers and certain ethnic minority groups⁴⁰ who are overrepresented in surrounding local authorities.</p> <p>Workers living in more deprived areas of London may access construction employment opportunities due to the proximity to Upminster Station and availability of the public transport network. Although there are relatively low levels of deprivation in the direct study area, the wider urban areas and neighbourhoods closer to London experience higher levels of deprivation and therefore may experience positive socio-economic impacts from construction jobs.</p> <p>However, negative equality effects may arise where employment opportunities are not accessible to individuals with protected characteristics. For example, roles that require high levels of skill or specific educational qualifications may create indirect barriers for groups that have historically or systemically faced limited access to education or training. This may include disabled people who may need reasonable adjustments, older workers who may not have accessed higher education or modern skill development, and ethnic minority groups who face systemic barriers to educational attainment. Reasonable adjustments and alternative pathways may be considered to mitigate these effects.</p>	<p>Planned action: A shuttle bus will be available from the site and South Ockendon and Upminster railway stations for construction workers commuting by rail or London Underground. During the peak construction period, a minimum of seven transfers will be provided during three-hour peak morning and evening travel periods.</p> <p>To mitigate the risk of negative equality effects, an Employment and Skills Plan will be required through the S106 agreement. This Plan will set out how the Proposed Development will create local job opportunities and support skills development in the community. In particular there is a requirement for the Plan to secure apprenticeship opportunities and 20% of the workforce to be local (within 10miles) during the construction phase.</p>
	Net increase in permanent jobs created in the Proposed Development	All groups, in particular young people, minority ethnic groups, people with	Once operational, it is anticipated that the data centre could deliver positive socioeconomic benefits through the generation of 350 direct jobs within Havering.

⁴⁰ Department for Work and Pensions (2025) The Employment of Disabled People 2024. Available at: [The employment of disabled people 2024 - GOV.UK](https://www.gov.uk/government/statistics/the-employment-of-disabled-people-2024); and UK Government (2023) Employment: Ethnicity Facts and Figures. Available at: [Employment - GOV.UK Ethnicity facts and figures](https://www.gov.uk/government/statistics/employment-ethnicity-facts-and-figures)

Potential Impact	Key groups affected	Description of effects	Planned and further actions
	<p>disabilities, lower-income households</p>	<p>These jobs are likely to be in specialised roles such as technicians, managers, engineers and system administrators, and therefore require specific qualifications. There may be positive equality impacts for groups underrepresented in employment figures if these opportunities are advertised effectively and they are able to benefit from employment opportunities to establish a new generation of workers. There may be positive socio-economic impacts for those residing in wider areas such as London due to proximity to Upminster Station and the availability of the public transport network. Whilst the immediate local area has low levels of deprivation, the employment opportunities may be particularly impactful for people living in more deprived urban areas closer to London.</p> <p>Negative equality issues may arise where groups are excluded from these opportunities, such as disabled individuals that require reasonable adjustments, older workers lacking modern skills and qualifications, and ethnic minority groups facing systemic educational disadvantages. However, it is also anticipated that there will be 1,430 indirect jobs created, including 280 within Havering. These opportunities may cover a range of alternative sectors with varying skill and education levels.</p>	<p>To mitigate the risk of negative equality effects, an Employment and Skills Plan will be required through the S106 agreement. This will set out how the Proposed Development would create local employment and opportunities for skills and training. In particular there is a requirement for the Plan to secure Bursary and Grant Funding for 10 students from Havering a year in relevant technical qualifications for period of 20 years and a minimum of 20% of the workforce to be local.</p>
<p>New skills and training opportunities during construction and operation</p>	<p>All groups, in particular Age, Race, Disability</p>	<p>The Proposed Development presents the opportunity for upskilling and retraining initiatives to nurture a new generation of workers. The provision of training (such as engagement at schools, work experience and apprenticeships) during construction and operation can positively impact the local community.</p> <p>Protected characteristic groups can benefit from these targeted initiatives which foster skills and career opportunities. There may be positive impacts for children and young people through engagement with schools and work experience opportunities. There may also be positive impacts for groups underrepresented in employment, particularly disabled people by providing access to training that builds confidence, workplace awareness and transferable skills that could bridge the employment and skills gap compared to non-disabled people.⁴¹</p>	<p>Planned action: The S106 HoT⁴² requires the Employment and Skills Plan to secure apprenticeship opportunities, upskill the construction workforce and engage with schools and colleges. The agreement also states that there should be supported employment opportunities for Havering residents and that care leavers should be given priority consideration for all opportunities.</p> <p>Further action: The Employment and Skills Plan should consider how the process for selecting schools for engagement sessions can maximise opportunities for individuals with protected characteristics (for example, this could include special education schools).</p> <p>Those underrepresented in unemployment figures could be prioritised in apprenticeships and learning opportunities to develop new skills and access employment.</p> <p>A Social Value Strategy will also be developed to support volunteering initiatives, with the number of volunteer hours monitored annually using the Social Value Portal. Depending on the volunteer initiatives supported, there may be positive impacts for skills developments for protected characteristic groups and lower-income households.</p>

⁴¹ Department for Work & Pensions (2025). The employment of disabled people 2024. Available at: [The employment of disabled people 2024 - GOV.UK](https://www.gov.uk/government/statistics/the-employment-of-disabled-people-2024) [accessed 08/01/26]

⁴² Section 106 agreements are legally binding agreements that the Council makes with developers in connection with planning permissions.

Potential Impact		Key groups affected	Description of effects	Planned and further actions
Health and wellbeing				
Beneficial	Mental health and wellbeing benefits of the ecology park	All groups, in particular older people, children and people with disabilities	<p>The ecology park could deliver positive mental health and wellbeing impacts through providing local residents and visitors with enhanced accessibility of open green space for recreation and exercise, that could support community well-being through socialising with others and promoting healthier lifestyles. Part 3 of the LDO documents (Design Code Ecology Park) sets out the provision of a Locally Equipped Area for Play (LEAP) on the western side of the park. Children and young families in particular may benefit from recreational days out at the ecology park including the LEAP and visitor's centre. In addition, the ecology park may benefit older people who are at greater risk of social isolation⁴³ and are overrepresented in the local population.</p> <p>Further, the provision of the shared pedestrian footpaths and cycleways could encourage the uptake of walking, wheeling and cycling within the local population. This could increase the levels of physical activity and deliver wider benefits, such as reducing local levels of obesity. This could be of particular benefit for wider visitors from Thurrock and Havering that do not meet the recommended levels of physical activity and are overrepresented in adult obesity figures.</p>	Not applicable
Adverse	Construction-related environmental impacts	All groups, particularly older people, children, people with disabilities, pregnant women	<p>During construction, there may be increased noise and vibration and poor air quality due to construction works and construction traffic. As set out in the Noise and Vibration Assessment within the ES, once mitigation measures are in place, there may be major adverse noise impacts from three phases of highway works for dwellings at Fen Lane and Ockendon Road. It is anticipated that there may be minor adverse vibration effects at all sensitive receptors within the local area. There may be major adverse noise impacts resulting from changes in road traffic within 50m of Fen Lane and negligible adverse noise from road traffic at receptors near all roads within the study area.</p> <p>Once operational, equipment such as cooling systems, generators and ventilation units can produce continuous low-level noise, which over a long-term period may have negative health and wellbeing impacts on employees and nearby residents. Overall, the operational noise and vibration impacts are anticipated to be minor. However, due to additional road traffic, it is anticipated that there may be major adverse impacts due to changes in road traffic noise at high sensitivity receptors within 50m of Fen Lane and minor to negligible impacts at other receptors across the study area.</p> <p>Protected characteristic groups may be disproportionately impacted by these environmental impacts. Older people, children, pregnant women and people with disabilities can be more sensitive to increased noise and vibration^{44,45}. Therefore, residents near Fen Lane and Ockendon Road represent these protected characteristic groups may be disproportionately impacted by negative noise and vibration effects. Further, older residents are nearby Care Homes such as Ladyville Lodge Care Home located on Fen Lane, and children attending nurseries in close proximity may be disproportionately impacted.</p>	<p>Planned action: The Environmental Statement sets out mitigation measures for noise, vibration and dust emissions for nearby receptors. For example, using noise control equipment and monitoring dust, noise and vibration levels throughout construction.</p> <p>The Code of Construction Practice (CoCP) sets core hours of working (8am-6pm Monday to Friday and 8am-1pm on Saturdays). The CoCP states that work completed outside of the core hours would only take place in accordance with a license provided by the Environmental Health Authority.</p> <p>The CoCP also states that temporary acoustic screening will be used on Build Zone C which should reduce noise impacts for nearby residences.</p> <p>In addition, the appointed contractor is expected to produce a full Construction Environment Management Plan (CEMP) confirming mitigation and monitoring measures to address these environmental impacts.</p> <p>Contractors and sub-contractors will have a responsibility to monitor safety during construction. A Project Environmental Manager (PEM) will be nominated and contact number disclosed at all entrances to the construction site for local residents and details will be provided to all relevant</p>

⁴³ NHS (2025) Loneliness in Older People. Available at: [Loneliness in older people - NHS](#)

⁴⁴ Hahad, O. et al (2022) Cerebral consequences of environmental noise exposure. Available at: [Cerebral consequences of environmental noise exposure - ScienceDirect](#)

⁴⁵ Ritz, B. (2021) Noise exposure and dementia: a rising concern in ageing populations. Available at: [Noise exposure and dementia: a rising concern in ageing populations | The BMJ](#)

Potential Impact	Key groups affected	Description of effects	Planned and further actions
		Older people, children, some people with disabilities and pregnant women can also be particularly vulnerable to the negative health impacts of poor air quality ^{46,47} . However, overall, it is considered that the construction of the Proposed Development will not give rise to significant adverse effects on air quality at sensitive receptors.	stakeholders. The PEM will be responsible for logging any enquiries or complaints from the public and will coordinate responses in a timely and satisfactory manner.
	Increased traffic flows during construction and operation	<p>All groups, particularly older people, children, people with disabilities and pregnant people</p> <p>It is anticipated that there will be increased traffic flows during construction as a result of HGV vehicle movements, other construction vehicles and staff access. Increased traffic flows can lead to congestion and increased journey times which can have negative impacts for those accessing key services identified in the surrounding area such as hospitals, schools, nurseries and care homes. This can disproportionately impact groups more reliant on these services, such as older people that are overrepresented in the local area, children, people with disabilities and pregnant women. However, the Transport and Accessibility Chapter of the ES concludes that the effects on driver delay during construction are not anticipated to be significant.</p> <p>Similarly, during operation there may be increased traffic flows on local roads including Ockendon Road to accommodate Data Centre and Horticulture staff members and visitors to the ecology park and visitor centre. Increased traffic flows can present accessibility barriers for residents living in close proximity to the site, especially those reliant on those key services. However, the Transport and Accessibility Chapter of the ES finds that whilst the effects on driver delay are adverse, the impacts are not anticipated to be significant.</p>	<p>Planned action: A Framework Travel Plan has been developed, outlining the ‘hard’ engineering measures and ‘soft’ management to implement throughout the operation of the Proposed Development including:</p> <ul style="list-style-type: none"> • Set up Travel Plan Steering Group to regularly review and identify ongoing issues with sustainable travel or delivery of measures outlined in the Travel Plan; and • Appoint a Travel Plan Coordinator responsible for the implementation of measures, ongoing monitoring and chairing the Travel Plan Steering Group. <p>As established in the CoCP, construction vehicle routing will be strictly controlled, with designated routes, directional signage and delivery and deliveries scheduled to avoid peak hours.</p> <p>Further action: The Travel Plan Steering Group should include representative of protected characteristic groups to allow the specific accessibility needs of these groups to be considered throughout the implementation of the Travel Plan.</p>
	Visual impact of the Proposed Development on surrounding residences	<p>Older people, people with disabilities, pregnant people</p> <p>The visual impacts of the Proposed Development may have negative impacts for people living in nearby residences. They may experience a loss of place attachment and a reduced sense of wellbeing due to landscape changes. Those who may spend more time at home, such as older people, people with disabilities, pregnant women and young families, as well as Care Home residents such as Ladyville Lodge on Fen Lane, may experience disproportionate negative visual impacts from their residences dependent on individual circumstances (e.g. employment status, caring responsibilities, health conditions).</p>	<p>Planned action: A number of landscape mounds will be used at strategic locations to make use of earth arisings and help screen views of the Proposed Development. The design and placement of these mounds have been shaped through an iterative design process, informed by ongoing landscape and visual assessments as well as stakeholder feedback Mounds will be planted with trees and integrated into the surrounding ecology park.</p>
Accessibility, Safety and Security			
Beneficial	Accessible pedestrian and cycle network	<p>Older people, people with disabilities, pregnant women and young children</p> <p>The ecology park will have a 3-metre-wide primary strategic shared pedestrian footpath/ cycleway accessible via wheelchair accessible kissing gates. Inaccessible infrastructure often acts as a barrier for people who are reliant on mobility aids, such as older people and people with disabilities⁴⁸. Therefore, the provision of accessible pedestrian footpaths/ cycleways with a width that allows two wheelchairs to pass alongside each other could improve access to green open space and nature for these groups. This may further contribute to the aforementioned physical and mental well-being</p>	<p>Planned action: Enhancements will be carried out to make sure that all pedestrian routes fulfil minimum design requirements. For example, highway works will be undertaken to provide a 1.5-metre-wide footway on the northern side of Fen Lane. This is the minimum width required to allow a wheelchair user to pass a pedestrian on foot.</p>

⁴⁶ Simoni, M. et al (2015) Adverse effects of outdoor pollution in the elderly. Available at: [Adverse effects of outdoor pollution in the elderly - PubMed](#)

⁴⁷ Aguilera, J. et al (2023) Air pollution and pregnancy. Available at: [AIR POLLUTION AND PREGNANCY - PMC](#)

⁴⁸ British Ecological Society (2022) Nature is for Everyone yet People with Disabilities Face Many Barriers. Here's What Needs to Change. Available at: [Nature is for everyone yet people with disabilities face many barriers. Here's what needs to change. - British Ecological Society](#)

Potential Impact	Key groups affected	Description of effects	Planned and further actions
<p>Accessible transport links</p>	<p>People with disabilities, pregnant women, young children, older people and lower-income groups</p>	<p>benefits and reduce the risk of social isolation. Similar benefits may also be felt by young families with pushchairs.</p> <p>While there is an existing public transport network surrounding the Proposed Development, highway works are planned to better connect the primary strategic shared pedestrian footpath/ cycleway to existing bus stops, including the northbound and southbound bus stops on Ockendon Road.</p> <p>This improved access to public transport may positively impact groups who are less likely to have access to a private car and allow these groups to realise the benefits of the Proposed Development, such as elderly people, children and young people, people with disabilities and lower-income households⁴⁹.</p> <p>The provision of a continuous connection between the primary strategic pedestrian footpath/ cycleway to the southbound bus stop may also benefit young families travelling to Fenland Nursery by bus through an extension of the footpath on the eastern side of the bus stop to the southern boundary of the Nursery.</p> <p>Further, highway works will be undertaken to make sure that new connections are accessible for all users. For example, informal crossing points to access the northern and southern bus stops will include dropped kerbs and tactile paving on each side of the road to support visually impaired and wheelchair user's access.</p> <p>The ecology park also has provision for at least 6% of parking spaces to be blue badge spaces for disabled and elderly users. This provides alternative access to the ecology park for people with disabilities who are unable to use public transport and require a car as a mobility aid.</p>	<p>Not applicable</p>
<p>Improved safety due to lighting</p>	<p>All groups, in particular women, people with disabilities, minority ethnic and religious groups, minority genders and sexualities</p>	<p>There may be positive safety impacts due to the introduction of lighting along pedestrian footpaths and connection corridors. New lighting will be provided along both the existing and newly proposed footpaths on the east side of Ockendon Road and the north side of Fen Lane, along junctions, at the entrance to the ecology park and at the crossing point facilitating access to Top Meadow Golf Course.</p> <p>This may disproportionately benefit women who may feel less safe when making journeys during darker hours due to the risk of discrimination, harassment and assault. Lighting has been shown to improve perceptions of safety for this group⁵⁰. This may also benefit other groups who are at greater risk of discrimination, harassment and assault, such as minority ethnic and religious groups, members of the LGBTQ+ community and people with disabilities.</p> <p>In addition, the introduction of lighting can make it easier to view the ground and detect surface irregularities (such as cracks, steps or loose paving) or obstacles. This can reduce the risk of slipping and tripping which may particularly benefit older adults and people with mobility or sensory impairments.</p>	<p>Planned action: New lighting will be designed to meet the specific requirements of the London Borough of Havering's Developer's Street Lighting Guide.</p>

⁴⁹ Government Office for Science (2019) Inequalities in Mobility and Access in the UK Transport System. Available at: [Future of mobility: inequalities in mobility and access in the UK Transport System](#)

⁵⁰ YouGov (2021) Women feel less safe walking home alone at night than in 2018. Available at: [Women feel less safe walking home alone at night than in 2018 | YouGov](#)

Potential Impact		Key groups affected	Description of effects	Planned and further actions
Adverse	Diversions during construction	Older people, children, people with disabilities, pregnant women	Temporary diversions may be required to facilitate construction. Temporary diversions can impact people walking, wheeling or cycling, particularly people with reduced mobility such as older people, people with disabilities, pregnant women and young children due to increased travel distances. Whilst there are services located within proximity to the PRowS (such as a care home and a nursery), it is assumed that the PRowS are primarily used for recreation. Should temporary diversions be required, they would increase journey lengths by less than 250m and therefore impacts are not considered significant.	<p>Planned action: The two existing PRowS will be kept open for as long as possible with dedicated and manned crossing points in place. If diversions are required, they will be temporary and in place for no longer than two months.</p> <p>In addition, the CoCP states that whilst PRowS may be crossed by construction traffic, they must otherwise not be used for construction traffic. Any damage to PRowS caused from plant crossings shall be rectified immediately once the crossings have ceased.</p>
	Safety and security risks during construction	Children, older people, people with disabilities	The ecology park will be implemented in phases and parts of the ecology park will be completed prior to full build out of the campus. Prior to completion, the Build Zones will be active construction sites which could pose safety and security risks. Older people may have slower reaction times which may increase the risk of trips or falls if walkways are uneven or obstructed, this could also negatively impact people with mobility impairments. Children may be more likely to enter restricted areas due to a lower awareness of the dangers of construction sites and therefore may be at greater risk of safety impacts. For people with sensory impairments, they may be less able to detect warnings (visual and alarms). It is anticipated that safeguarding measures implemented throughout construction will minimise the likelihood of safety and security risks arising.	<p>Planned action: To mitigate these safety and security risks, clear signage will be used to indicate construction zones, exclusion zones, safety protocols, emergency exits and site rules. Comprehensive testing of all installed systems and components will be carried out to ensure functionality, safety and compliance with specifications and regulations.</p> <p>Contractors and sub-contractors will also have a responsibility to monitor safety. A PEM will be appointed to monitor and report any resident or visitor concerns during the construction phase.</p> <p>In addition, as set out in the CoCP, there will be a temporary security hut and manned security checkpoint at the entrance to control access and monitor site activities.</p>
Wider impacts				
Beneficial	Development of local skills and cumulative employment impacts	All groups, particularly lower-income households	There may be positive cumulative impacts from employment opportunities in the Proposed Development. Employment opportunities may increase local knowledge and skills. These skills may be transferrable to other long-term jobs created through increased demand in related industries. Therefore, this could improve employment security within the surrounding area, particularly due to its proximity to the Thames Freeport Economic Zone which could attract technology and digital firms in the future. This may be particularly beneficial for lower-income households and those overrepresented in unemployment through providing training opportunities in transferable skills which could also bring wider benefits for the local economy.	<p>Further action: A Social Value Strategy will be developed to support volunteering initiatives, with the number of volunteer hours monitored annually using the Social Value Portal. Depending on the volunteer initiatives supported, there may be positive impacts for skills developments for protected characteristic groups and lower-income households.</p>
Adverse	Cumulative health and wellbeing impacts	All groups, particularly older people children, people with disabilities, pregnant women	As a result of additional local infrastructure projects (such as improvements or changes to railway stations, transport corridors, energy hubs, storage facilities, and the electricity grid), there may be cumulative health and wellbeing impacts. This can result in cumulative environmental impacts (such as increased noise and vibration, reduced air quality), increased construction traffic and visual impacts. This can negatively impact groups more sensitive to negative environmental impacts, such as older people, children, people with disabilities and pregnant women.	<p>Planned action: The Environmental Statement has undertaken an assessment of the potential for cumulative impacts.</p>

8. Conclusions and next steps

8.1 Conclusions

This EqIA has presented an overview of the potential impacts on protected characteristic groups of the Proposed Development. The EqIA has identified potential beneficial equality effects as follows:

- During construction and operation increased employment opportunities may benefit local populations, particularly those underrepresented in employment statistics. Increased employment opportunities may have positive socio-economic impacts for lower-income households in more deprived urban areas near London.
- The Proposed Development may have positive impacts through new skills and training opportunities provided as part of the Employment and Skills Plan, such as outreach and engagement with schools.
- There may be wider long-term benefits generated through employment, skills and training opportunities which may be transferrable to other long-term jobs created through increased demand in related industries. The ecology park and accessible footways may have positive mental and physical health benefits for local residents, particularly for those who are mobility impaired who may typically face barriers when accessing green space.
- The connections between footpaths and public transport may positively impact the local community, particularly those more reliant on public transport. The introduction of lighting along pathways may also improve perceptions of safety for protected characteristic groups, particularly women.

However, there remains some potential negative equality impacts resulting from the Proposed Development. The majority of these are anticipated during the demolition and construction stage. These include:

- During construction and operation there may be negative environmental impacts including increased noise, vibration and air pollution. This may disproportionately impact people with disabilities, older people, children and pregnant women who can be more sensitive to environmental impacts.
- The data centre may have negative visual impacts which may disproportionately impact groups who may spend more time at home, such as older people, people with disabilities, pregnant women and young children.

The LPA has demonstrated due regard to their PSED throughout the LDO stage. These include:

- Preparation of an Environmental Statement assessing the potential impacts of key themes – such as socioeconomics, transport, noise and air quality, and landscape and visual effects – that intersect with equality considerations;
- Development of a Travel Plan outlining ‘hard’ engineering measures and ‘soft’ management measures to implement throughout the operation of the Proposed Development and management actions including setting up a Travel Plan Steering Group and appointing a Travel Plan Coordinator;

- Requiring an Employment and Skills Plan to be submitted setting out how the Proposed Development will create local employment opportunities and support skills development in the community; and
- Development of the Code of Construction Practice establishing frameworks for health and safety, stakeholder engagement and protection of vulnerable groups during construction, ensuring that activities are carried out with the needs of vulnerable and diverse community members in mind.

8.2 Next steps

The key equality impacts identified through this EqIA for different groups with protected characteristics are summarised in **Chapter 7**. This identifies priority groups for which there are differential and disproportionate impacts as a result of the proposals, covering all protected characteristic groups but particularly age and disability.

The ongoing Proposed Development should reflect the planned mitigation and further actions outlined in **Chapter 7** of this EqIA and it should be shared across relevant residents and stakeholders for review and awareness.

This EqIA should be considered as a live document and should be updated on a regular basis. This should include an update to reflect feedback from Statutory Consultation in Spring 2026 and following approval a monitoring update on the status of identified potential impacts and associated mitigation. This may result in updates both to assessment of the impacts and to the actions and recommendations relating to the proposed mitigation measures.

