

## **Crossrail**

### **Equality Impact Assessment**

#### **Public Consultation Comments & Crossrail's Response**

**January 2008**



## **1 Introduction**

### **1.1 Background to the project and its EqIA**

- 1.1.1 Crossrail is a major new railway that will run under central London through new tunnels, linking Maidenhead and Heathrow in the west with Shenfield and Abbey Wood in the east. The Secretary of State for Transport is promoting the parliamentary Bill that will make provision for the project, and she is assisted in this by Transport for London (TfL), and Cross London Rail Links Limited (CLRL) – a joint venture company owned equally by the Department for Transport (DfT) and TfL.
- 1.1.2 The project aims to deliver transport and regeneration benefits. In doing so, all parties are intent on incorporating current thinking and good inclusivity practice into the planning, implementation and operation phases of the project.
- 1.1.3 The Crossrail Bill was submitted to Parliament in February 2005, and the Equality Impact Assessment (EqIA) was published in January 2006<sup>1</sup>. Since the Bill's deposit, a number of revisions to the original Bill proposals have been identified as being necessary. These Amendments of Provisions to the Bill<sup>2</sup> are referred to as APs. These APs are submitted to Parliament and are subject to a petitioning period in the same way as the Bill itself.
- 1.1.4 As part of the commitment for assessment, consideration and reconsideration during the development of the project, a process of ongoing assessment has taken place to consider the equality impacts of the APs. To date, four sets of APs to the Crossrail Bill have been submitted, known as AP1 (submitted January 2006), AP2 (submitted May 2006), AP3 (submitted November 2006), and AP4 (submitted May 2007). The impacts for AP1 were taken into consideration in the original EqIA. An AP EqIA was published in February 2007 to consider the impacts arising from AP2 and AP3<sup>3</sup>. AP4 EqIA was published in February 2007 to consider the impacts arising from AP4<sup>4</sup>.
- 1.1.5 The Crossrail Equality Impact Assessments report on the work that CLRL, DfT and TfL have undertaken so far to identify and seek to

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<sup>1</sup> [http://www.crossrail.co.uk/80256B090053AF4C/Files/crossrailequalityimpactassessment/\\$FILE/eqia+a4+report.pdf](http://www.crossrail.co.uk/80256B090053AF4C/Files/crossrailequalityimpactassessment/$FILE/eqia+a4+report.pdf)

<sup>2</sup> This is the term used to describe an Amendment to the Bill to which Private Business Standing Orders of Parliament are applicable

<sup>3</sup> [http://www.crossrail.co.uk/80256B090053AF4C/Files/crossrailequalityimpactassessment/\\$FILE/ap+eqia+february+2007.pdf](http://www.crossrail.co.uk/80256B090053AF4C/Files/crossrailequalityimpactassessment/$FILE/ap+eqia+february+2007.pdf)

<sup>4</sup> [http://www.crossrail.co.uk/80256B090053AF4C/Files/crossrailequalityimpactassessment/\\$FILE/ap4+eqia+august+2007.pdf](http://www.crossrail.co.uk/80256B090053AF4C/Files/crossrailequalityimpactassessment/$FILE/ap4+eqia+august+2007.pdf)



mitigate the potential equality impacts of the project. The reports assess the impacts from the project and policy objectives that are currently likely to benefit or adversely impact on priority groups. The AP and AP4 EqIA reports provided an assessment of the equality impacts arising from the revised proposals to which the APs related – specifically, describing by location, the permanent and temporary impacts either created or eliminated by the APs and considering the priority groups likely to be affected.

## **1.2 The purpose of this report**

- 1.2.1 This report includes the public consultation comment received between 21 December 2005 and 18 April 2006 (14 weeks) on the original EqIA, and presents the project's response. AP EqIA and AP4 EqIA were subject to a twelve week consultation period. No comments were received for either of the AP EqIAs.
- 1.2.2 This document forms part of the Equality Impact Assessment (EqIA) that the DfT, TfL and CLRL are working together to complete. It is a consolidated equality assessment building on the good practice from within these organisations.
- 1.2.3 In developing, agreeing and publishing this report, the DfT is acting in compliance with its statutory requirements and meeting appropriate levels of assessment for this stage of the project – the assessment, consideration and re-consideration will develop as the project progresses. The DfT is committed to working closely with TfL and CLRL to deliver a railway fit for the purpose of serving the needs of the whole community.

## **1.3 Priority groups selected for the assessment**

- 1.3.1 The following priority groups were taken into consideration in the assessment:



<b>Priority Group</b>	<b>Definition</b>
Age	children and young people up to the age of 25 and people over 50
Disability	all disabled people, such as those with mobility or sensory impairments, learning difficulties or mental health problems
Socio-economic deprivation	those in the 20 per cent nationally most deprived areas
Faith	minority faith groups including Buddhist, Hindu, Jewish, Muslim and Sikh
Gender	females and transgender
Race	Asian, Asian British, Black, Black British, Chinese, Mixed, Gypsies, Travellers and other
Sexual orientation	lesbians, gay men, and bisexuals

1.3.2 The priority groups selected conform to TfL equality guidance, with the addition of a socio-economic deprivation group which CLRL has added due to the benefits the project is expected to deliver in regeneration of deprived areas and due to the significance of job loss.

1.3.3 In this report, race includes the generic term of 'Travellers', which includes the British Isles travelling community. As a group, Travellers is spelt with a capital T to distinguish them from people making a journey. Gypsies includes the Romany (Romani) community.

## **2 Public consultation**

### **2.1 The purpose of consultation**

2.1.1 As a publicly owned company, CLRL is committed to acting in a responsible and professional manner. Crossrail also has a strong commitment to work closely with government and statutory bodies and those with an interest in the project. The former Office of the Deputy Prime Minister (ODPM) issued guidelines called the 'Code of Practice for the Dissemination of Information during Major Infrastructure Projects', which Crossrail is following. Crossrail has developed some key consultation objectives:



- Identify and contact a wide range of stakeholders and interested parties;
- Uphold social inclusion, be fair, open and honest;
- Record, analyse, respond and report on consultees' comments;
- Assess the level of support for the proposals;
- Identify concerns and, where practical, identify ways to mitigate them.

2.1.2 After the publication of the original EqlA, a 14 week public consultation period enabled people to comment on the document. Views were wanted on the adequacy and fairness of the report's assessment of likely equality benefits and likely adverse equality impacts, whether the report had omitted any likely equality benefits or likely adverse equality impacts, and on the effectiveness and appropriateness of the mitigation policies and measures proposed. Any other comment on wider equality considerations raised by the Crossrail project was welcome. Following the publication of AP and AP4 EqlAs, a 12 week consultation period enabled people to comment further on these documents.

## **2.2 Methodology**

- 2.2.1 The original EqlA was previously made available electronically in advance of formal publication on 21 December 2005, in order to provide stakeholders with an opportunity to consider it as early as possible.
- 2.2.2 To maximise readership potential, the EqlA and briefing leaflet, summarising the EqlA, were made available in accessible formats including large print, Braille, easy read, audio cassette and CD versions. The briefing leaflet was translated into 13 London languages. The EqlA and appendices were prepared in large print.
- 2.2.3 This consultation has been produced in accordance with the principles of the Government's Code of Practice on Consultation, which sets out the following criteria:
1. Consult widely throughout the process, allowing a minimum of 12 weeks for written consultation at least once during the development of the policy.
  2. Be clear about what your proposals are, who may be affected, what questions are being asked and the time-scale for responses.
  3. Ensure that your consultation is clear, concise and widely accessible.
  4. Give feedback regarding the responses received and how the consultation process influenced the policy.



5. Monitor your Department's effectiveness at consultation, including through the use of a designated consultation co-ordinator.
6. Ensure your consultation follows better regulation best practice, including carrying out a Regulatory Impact Assessment if appropriate.

2.2.4 Press releases and a bulletin was sent electronically and by post to 25,000 contacts stored within Crossrail's database to advertise the publishing of Crossrail's first EqIA; mail-outs were sent to everyone on the equality directory consisting of national and local organisations, priority group representatives, stakeholders, and local authorities (including local strategic partnerships).

### **3 Public consultation comments and Crossrail's response**

- 3.1 The table below includes the public consultation comments, and presents the project's response.



No.	Consultee/ Organisation	Comment	Response
1	Greater London Authority	<p>Disabled Access - Ideally the GLA would like all the Crossrail stations to be upgraded in keeping with inclusive design principles. The GLA is concerned that there have been no equality impacts identified for Gidea Park station, when it is one of several which is not currently accessible to people who cannot use stairs.</p>	<p>Crossrail is committed to the creation of an inclusive transport system and, where reasonably practicable, have made stations fully accessible. All newly-built stations in the central tunnel section of the route will provide step-free access from street to platform level. In 2006, further consideration was given to the number of stations that were to be upgraded to provide step-free access in light of the Department for Transport's 'Access for All' initiative. As a result, an additional four stations on the north-eastern section of the line – namely Forest Gate, Goodmayes, Gidea Park and Harold Wood – have been added to the list of stations that are proposed to be upgraded. Crossrail will now provide independent, step-free access from street level to the platforms in both directions at 28 of its stations. This means that, across the route, it is expected that 93% of all passenger trips on Crossrail will start and end at a Crossrail station with step-free access from street to platform level. The selection criteria for upgrading existing stations has been based on the projected passenger numbers at the station, the capital cost to upgrade to step-free access, and the distance to the nearest accessible station. Where step-free access is not available, the proposal is that dignified, alternative arrangements or auxiliary aids will be employed. Work to provide an inclusive transport system will continue throughout the life of the project. It is proposed that 'Design and Access Statements', addressing accessibility issues, will be submitted in support of relevant applications for the approval of details made of qualifying local authorities under the planning regime established in Schedule 7 of the Bill. In addition, access audits will be carried out during design development, and accessibility statements produced. In this way, issues of importance to people with restricted mobility will be taken into account as an integral part of the detailed design development.</p>



No.	Consultee/ Organisation	Comment	Response
2	Greater London Authority	Impacts by Location – Where bus replacement services are to be used, the GLA would want Crossrail to use accessible buses with CCTV, to ensure consistency with the rest of the London Bus Network (100% accessible and CCTV fleet).	Where bus replacement services are to be used the nominated undertaker would, where reasonably practicable, seek to use buses provided by Transport for London. Where bus replacement services are required outside Greater London, local bus providers will be used.
3	Greater London Authority	It is not clear under 'Journey Information' whether consideration has been given to people who are not literate in English. Obviously the GLA would want Crossrail to consider this.	CLRL will continue to provide accessible information formats in line with Transport for London policy and standards, and ensure that it meets its statutory duties to provide accessible information to its customers. It will keep up to date on best practice guidelines and implement solutions that meet its customers' information needs.
4	Greater London Authority	Access to Key Services - The GLA is curious to know why Crossrail considers universities to be one of just two key priority services both, as opposed to other services, and as opposed to other educational establishments.	This work was based on the socio-economic work completed for the Environmental Statement, which was based on DfT Accessibility Performance Indicator LTP1 and associated guidance. It does give a measure of the effect of Crossrail on accessibility to establishments that attract priority groups.
5	Greater London Authority	Data - The GLA would like to know what 'This data will also be used to raise CLRL's awareness of race and faith sensitivities, and to help to protect and deliver the projects equality benefits' (p31, 3rd paragraph) means in practice.	This section was intended to explain that by knowing where significant differences in race or faith populations exist, CLRL can better design its communication strategy and better target its audiences when consulting, for example, on mitigation.



No.	Consultee/ Organisation	Comment	Response
6	Greater London Authority	There are numerous locations where local community facilities such as schools, health centres and churches will be affected by construction noise. The GLA would want to be assured that these organisations have been consulted with regarding the works prior to them happening and that Crossrail has indeed made appropriate efforts to minimise the impact.	Crossrail has sought to engage with all relevant stakeholders throughout its development and will continue to do so. Land use surveys and property referencing, as well as extensive consultation should have established relationships with many of these community facilities. Likely impacts were assessed and consulted on in the Environmental Statement <sup>5</sup> . The nominated undertaker will be required to comply with the Environmental Minimum Requirements (EMRs) <sup>6</sup> – which include a Construction Code to manage the impacts during construction, and the undertakings and assurances given by the Promoters of the Crossrail Bill. Together these controls will ensure that impacts which have been assessed in the Environmental Statement will not be exceeded (unless this results from a change in circumstances that was not likely at the time of the environmental assessment). The documents comprising the EMRs have been the subject of consultation with local authorities and other key stakeholders, and closely follow those established for the Channel Tunnel Rail Link, which have generally worked well.

<sup>5</sup> The Environmental Statement includes the Supplementary Environmental Statements (SES1-4) and Amendment of Provisions Environmental Statements (APES1-4) ; all the Environmental Statements are available at <http://billdocuments.crossrail.co.uk>

<sup>6</sup> [http://billdocuments.crossrail.co.uk/80256FA10055060F/pages/\(includingdraftconstructioncode\)](http://billdocuments.crossrail.co.uk/80256FA10055060F/pages/(includingdraftconstructioncode))



No.	Consultee/ Organisation	Comment	Response
7	Greater London Authority	In addition the GLA would like to seek assurance that Crossrail have sufficiently identified all opportunities to optimise sustainable transport options for the transportation of construction materials associated with Crossrail.	The construction of a project the scale of Crossrail will require the removal and delivery of large quantities of materials throughout the route. The project is expected to generate some 8 million cubic metres of excavated materials and construction waste. The project policy is to recycle and reuse as much of this material as possible. On the assumption that material is taken to disposal sites, it is expected that about 30% of the excavated material being removed from worksites will be transported by rail, 15% by barge and the remainder by road. Deliveries will include an estimated 1.1 million cubic metres of concrete, 140,000 tonnes of steel reinforcement and 140 kilometres of rail. The delivery of materials such as ballast, sleepers and rails is expected to be mainly by rail. The Construction Code includes controls on vehicle and plant emissions, which refer to maximising energy efficiency.
8	Greater London Authority	Royal Oak Portal - The GLA is concerned about the loss of the Great Western Studios and the niche enterprises that these accommodate. The GLA would like to be provided with assurance that the organisations currently using the Studios will be communicated with regarding the proposed development; will be consulted with and provided with suitable and appropriate alternative accommodation or compensation packages and that there will be at least as many niche enterprises if not more in the general area, after the works have been completed.	The House of Commons Select Committee heard the case of the Great Western Studios. The following statement was given by Crossrail's property expert witness: <i>"What we can give, and we will do, as we have already said to this Committee, we will set up an agency to help these people look for alternative premises. Naturally, we would do that after Royal Assent, because obviously this House has to consider whether they approve of the Crossrail going forward. If the Bill is enacted and the scheme goes forward, we will then be looking for alternative premises. We will give Great Western Studios that help in looking for alternative premises. What I think the problem here is - I am sure we can find alternative premises, but whether we can find it as big as this - that we cannot do is find the premises at no cost. Where Crossrail are coming from, and where I have to say the Compensation Code is coming from, is there is a provision for them to be subsidised thereafter by the Promoters, that is the difficulty."</i> (HC 235-IV, Ev 1231) <sup>7</sup>

<sup>7</sup> The House of Commons Select Committee on the Crossrail Bill's First Special Report of Session 2006-07 is available at <http://www.publications.parliament.uk/pa/cm/cmccross.htm>



No.	Consultee/ Organisation	Comment	Response
9	Greater London Authority	Tottenham Court Road Station - The GLA is concerned about the loss of an established gay leisure venue (G.A.Y at the Astoria) and would want to be assured that the organisers and the clientele have been consulted with regarding the developments; that a suitable and appropriate alternative venue is found, which is on a par with, if not better than the current venue and that the clientele is made aware of the change in venue so that the number of clientele remains the same, if not, increases	During pre-application consultation the proposed works were presented and consulted on. Information describing the proposals and explaining that the Astoria would need to be demolished was displayed at Information Centres, published on the Crossrail website and provided to anyone who requested it by post or email. When the Crossrail Bill was deposited the owners and qualifying leaseholders of buildings over which rights are proposed to be acquired were sent Notices. Crossrail has had contact with the owners of the building, the leaseholders of the venue and the organisers of the G.A.Y. event and have explained what the proposals mean. Information Paper C1, 'Information for Property Owners' <sup>8</sup> , explains that a relocation service will be available to assist in finding alternative accommodation for businesses. It will be for the organisers of G.A.Y. to communicate with their clientele at an appropriate time.
10	Greater London Authority	Farringdon Station - The GLA is concerned that the impact on Smithfield Market might be broader than simply the loss of car park spaces.	The main issue raised by Smithfield Market Tenants Association was the protection of traders during the construction of Crossrail. Items of concern presented included: traffic impacts, loading bay provisions in Lindsey Street, dust impacts on meat, structure and integrity of market buildings, and compensation. The petition was heard in the House of Commons Select Committee on Tuesday 28 February 2006 and Wednesday 1 March 2006. The Promoter accepted the judgement of the Committee that the exceptional and historical nature of the business of the tenants of Smithfield Market justified additional rights to compensation with respect to impacts caused by the Crossrail works for this special case. The Committee invited the Promoter to draw up an alternative provision which would provide the tenants with the right to claim compensation in circumstances where a specific level of loss was experienced.

<sup>8</sup> All Crossrail Information Papers are available at <http://billdocuments.crossrail.co.uk/80256FA10055060F/pages/informationpapers>



No.	Consultee/ Organisation	Comment	Response
11	Greater London Authority	<p>Eleanor Street Traveller's Site - The GLA is particularly concerned about the impact of the loss of some of this site. The GLA would want assurance that the users and residents of the site have been communicated with regarding the developments that are being proposed and that they have been consulted with regarding suitable and appropriate alternative sites. The GLA has been led to believe that Crossrail intends to leave a legacy of a larger site at this location, once the works have been completed. The GLA supports this, provided this is consistent with the wishes of current and future users and residents of the site. In this case the GLA would expect the users and residents to be involved in the design of the reinstated site and its amenities and would expect the site and the amenities to be on a par with, if not better than, current provision as appropriate.</p>	<p>Since submission of the Bill, a revised scheme has been developed to enable the residents to remain within the Bow Triangle in a reconfigured site during both the construction and operational phases of Crossrail. This will require an additional area of land to accommodate the displaced residents and, hence, an Additional Provision (AP2) to the Bill was required. The proposed site for relocation of the residents is approximately 30% larger than the existing area available for the residents. Residents will be involved in the design of the reinstated site and its amenities. CLRL and/or the nominated undertaker will bear no responsibility for providing a site that includes any improvements over and above those contained in the site that they will be replacing. However, they will be expected to respond sympathetically to any request for improvements that will be paid for by a third party, or changes that are cost neutral, where these do not materially conflict with the construction or operation of Crossrail or the interests of other parties (such as local businesses).</p>



No.	Consultee/ Organisation	Comment	Response
12	Greater London Authority	Custom House Station - The GLA is concerned with the apparent lack of intention to provide alternatives for the loss of the homeless people's hostel.	Crossrail did not receive a petition from either the owner of the property or the local authority on this matter; therefore, Crossrail's business relocation and property acquisition policies will apply. Businesses displaced by Crossrail will be compensated within the provisions of the relevant compulsory purchase legislation (for further information see Information Paper C2, 'Operation of the National Compensation Code'). The national compensation code recognises the importance to businesses displaced from their existing premises, by compulsory purchase of those premises for public works, of being able to relocate to another site. The national compensation code normally provides for the cost of such relocation to be taken into account under the heading of disturbance compensation. With a view to assisting those existing businesses which do face the prospect of displacement from their existing premises in relation to Crossrail in their search for suitable alternative accommodation, the Secretary of State will establish an agency service at his expense (or that of his nominated undertaker). The agency service will help firms ascertain their property requirements and advise them on what suitable property might then be available to meet their reasonable accommodation needs. Close contacts will be established with property agents, landowners, developers and local authorities to ensure that reliable and effective information is provided.
13	Greater London Authority	North Woolwich Portal and Thames Tunnel - The GLA is concerned with the apparent lack of intention to provide alternatives for the loss of the skateboarding area	The temporary loss of the skateboarding area acquired for the construction of the Warren Lane shaft is reported in the Environmental Statement as a significant impact (Volume 3, Section 11.7.97). Accordingly, the Secretary of State will seek to agree appropriate mitigation with the relevant planning authority. The approach to mitigation is set out in Information Paper D13, 'Restitution of Open Space'.



No.	Consultee/ Organisation	Comment	Response
14	Greater London Authority	<p>Consultation Results - The 'priority groups' cited, for example "Age", "Disabled", "Economic deprivation" "Gender", "older people" and "race" are grammatically inconsistent.</p> <p>Deaf people who are use sign language prefer to be called Deaf with a capital D.</p>	This comment has been noted for future work.
15	Greater London Authority	<p>Hanbury Road (St) Shaft - The GLA applauds Crossrail's decision against carrying out the works originally proposed at this site. The GLA had concerns about the gap between the high level of disruption this would have caused to local communities and the low level of benefit afforded to them. Further the GLA was concerned about the high volume of lorries that would have been operating in this area where there are narrow streets and a relatively high number of Black, Asian and ethnic minority children (BAME). This was of particular concern given the statistical data regarding the disproportionate number BAME children being involved in traffic accidents.</p>	Crossrail acknowledges the statistical data regarding the disproportionate number of BAME children being involved in traffic accidents. A liaison group for schools in the Spitalfields area has been set up, discussions on Crossrail's current plans have taken place, and the schools are keen to be involved in the project's detailed design. All lorry routes will be subject to local authority approval.



No.	Consultee/ Organisation	Comment	Response
16	Greater London Authority	<p>             Pudding Mill Lane Portal and North Woolwich Portal and Thames Tunnel - The GLA is particularly concerned about the displacement/loss of businesses here, especially as they are disproportionately small businesses which are either owned by or employ a relatively high number of BAME people, as well as being in an area where unemployment is currently high. The GLA would want assurance that the users and residents of the site have been communicated regarding the developments that are being proposed and that they have been consulted with regarding suitable and appropriate alternative accommodation or compensation packages. Ideally the GLA would want to see increases in the number of minority owned businesses and employees in the general area as an outcome of the displacement programme.           </p>	<p>             Businesses displaced by Crossrail will be compensated within the provisions of the relevant compulsory purchase legislation (for further information see Information Paper C2, 'Operation of the National Compensation Code'). The national compensation code recognises the importance to businesses displaced from their existing premises, by compulsory purchase of those premises for public works, of being able to relocate to another site. The national compensation code normally provides for the cost of such relocation to be taken into account under the heading of disturbance compensation. With a view to assisting those existing businesses which do face the prospect of displacement from their existing premises in relation to Crossrail in their search for suitable alternative accommodation, the Secretary of State will establish an agency service at his expense (or that of his nominated undertaker). The agency service will help firms ascertain their property requirements and advise them on what suitable property might then be available to meet their reasonable accommodation needs. Close contacts will be established with property agents, landowners, developers and local authorities to ensure that reliable and effective information is provided.           </p>



No.	Consultee/ Organisation	Comment	Response
17	Greater London Authority	The 'Use of Local Labour' is unduly defensive in its reference to the illegality of employing local residents. Whilst this may be so for public sector organisations there are no such restrictions on the private sector. Indeed the construction industry is renown for the casual nature of its recruitments practices! However the proposed mechanisms for encouraging contractors to attract and build the skills of the local labour force is to be applauded.	This comment has been noted. Work on the local labour policy will be further developed following Royal Assent of the Crossrail Bill.
18	Greater London Authority	Hayes and Harlington station – Will pick up/set down points and disabled spaces be a legacy of the works after the development has been completed?	There will be a temporary loss of parking spaces in the station car park. These will be reinstated following construction. Reserved parking for persons of reduced mobility will be provided at stations where spaces are already available.
19	The Institution of Highways and Transportation (IHT)	We would urge DfT to require scheme proponents to demonstrate how equalities issues have been included within the entire planning process, not simply in a supplementary impact-mitigation way.	The EqIA was based on community impacts identified in the Environmental Impact Assessment. Legislation and regulations and their applicability to the railway industry are still emerging. Crossrail is the first project to publish an EqIA. Equality issues were considered in the development of the project, and it is a requirement that all public projects do the same.
20	The Institution of Highways and Transportation (IHT)	An executive summary, or a set of conclusions that includes a summary of the principal findings, would be helpful to improve the readability of the document by professional audiences.	This comment has been noted for future work.



No.	Consultee/ Organisation	Comment	Response
21	The Institution of Highways and Transportation (IHT)	We accept that a first stage of analysis is to identify the changes based on current residential and workplace locations of those suffering from social disadvantage. But the EqlA should include a note recognising that the distribution of disadvantage may not always follow this pattern and that Crossrail will influence spatial patterns of disadvantage.	The distribution of disadvantage may change over time, but there is no reliable basis for forecasting this. It is generally considered that Crossrail will increase social inclusion along the line of route, and will not cause an increase in social disadvantage elsewhere.
22	The Institution of Highways and Transportation (IHT)	Crossrail will impact and affect residents and travellers across a very large part of the transport system. For this reason it is sensible to base the analysis of the impact on the project on the travel demand forecasting modelling for Crossrail that has been undertaken for project planning and appraisal purposes. Simply using catchment areas around stations fails to take account of the transport system performance improvement that will assist many other communities, beyond those directly served by Crossrail.	We agree that Crossrail impacts are complex and will spread over a wide area. For this reason, we have used the CAPITAL accessibility model to assess accessibility impacts. CAPITAL uses the public transport network from one of the forecasting models and provides detailed information on the extent to which travel times change to specific origins or destinations. For the purpose of the assessment presented in the Environmental Statement and EqlA, we have summarised the changes in accessibility in accordance with DfT Accessibility Performance Indicator LTP1 and associated guidance.



No.	Consultee/ Organisation	Comment	Response
23	The Institution of Highways and Transportation (IHT)	<p>Utilising the transport modelling of Crossrail will also allow a more sophisticated measure of system impact. In the Equality Impact Assessment, analysis is based on “all or nothing” type assessment – either someone is within 30 minutes catchment of a station or they are not. In reality of course, impact varies spatially with those living or working close to stations gaining most, while those living further away benefit less. Transport modelling estimates both the extent of the benefit and the number of beneficiaries and can link this to the origins or destinations of the trip. Hence the project team already understands the likely detailed pattern of beneficiaries from its modelling work and it is this that should be used as the basis for the equalities assessment rather than simple catchment area boundaries.</p>	<p>It is true that the impacts reported are summaries of a complex pattern of changes in accessibility, and it is these complex changes, assessed by CAPITAL, which are used to derive a simple and easily understood measure of accessibility for Universities, Regional Hospitals and Metropolitan and Regional centres, as described in the EqlA and the Environmental Statement. CLRL agrees with the description of the transport modelling; however, although the transport models indicate the geographical pattern of benefits, they do not indicate whether the beneficiaries (the people making the actual trips) belong to any particular priority group. For example, morning peak trips from a particular area are more likely to be made by people travelling to work, who are less likely to be economically deprived. The EqlA measures address impacts on specific priority groups or trip purposes and, therefore, present a more detailed assessment of EqlA impacts than the transport models. Utilising the benefits from the transport models would give a more general and less sophisticated measure of equality impacts.</p>



<b>No.</b>	<b>Consultee/ Organisation</b>	<b>Comment</b>	<b>Response</b>
24	The Institution of Highways and Transportation (IHT)	<p>The Department for Transport now requires use of accessibility analysis for local transport plans. These techniques should be used to help understand the impact of Crossrail on travel opportunities to healthcare, employment, education and shopping destinations. By understanding the spatial impact of Crossrail, consideration can be given to the distributional consequences on different groups as they are represented in the socio economic data for each area. In this way it will be possible to establish whether Crossrail contributes to social inclusion by establishing whether those groups are more or less well represented in the areas that will benefit.</p>	<p>DfT Accessibility Performance Indicator LTP1 and associated guidance has been used to guide the assessment and Crossrail has summarised the access impacts of the project on the four types of destination described in the guidance. As described above, the EqIA measures consider specific priority groups, rather than assuming that all people in a particular geographical area receive the transport benefits equally.</p>



No.	Consultee/ Organisation	Comment	Response
25	The Institution of Highways and Transportation (IHT)	Crossrail contributes to social inclusion by establishing whether those groups are more or less well represented in the areas that will benefit. Destination opportunities used in the EqlA are not the most appropriate that could be chosen We recommend that the EqlA should consider benefits arising from all transport consequences of the project, not just introduction of the primary route, use measures that reflect the degree of benefit gained, avoiding arbitrary catchment area definitions, use locations that are of greater relevance to the everyday needs of the community and use accessibility mapping to encompass all these issues.	Crossrail considers that the appropriate assessment has been provided within the EqlA, consistent with relevant guidance.



No.	Consultee/ Organisation	Comment	Response
26	The Institution of Highways and Transportation (IHT)	<p>This EqlA appears to seek to demonstrate that in certain selected respects, people in disadvantaged communities and groups will benefit from Crossrail. In our view, this is not a sufficient test of equal treatment. We would like to see a demonstration that the benefits of Crossrail are disproportionately focussed on those who are currently disadvantaged – and similarly that the adverse impacts of Crossrail are not disproportionately borne by those who are already disadvantaged. This requires not simply an analysis of the benefits to one group, but an overall assessment of the relative benefits and disadvantages between all groups. It is therefore necessary to look at the relative benefits offered to deprived communities compared to the average impact throughout London. For it is only by improving the relative position of those who are disadvantaged that real progress in achieving social inclusion will be achieved. We believe therefore that an EqlA should aim to demonstrate that the benefits of Crossrail are disproportionately focussed, for example, on public transport users, whom we believe to be less well off than relative position of those who are disadvantaged ...</p>	<p>Figure 3.1 in the EqlA clearly demonstrates that Crossrail serves a disproportionate number of economically disadvantaged areas. The benefits that will flow from the project are significant and greatly outweigh potential disadvantages. They will be spread over a wide area but will be most noticeable in the vicinity of the Crossrail stations. As discussed above, the analysis suggested in this comment does not take into account who is making the trips, and for what journey purpose. Looking at where transport economic benefits accrue does not indicate who they accrue to within that area. A large part of the transport economic benefits will accrue to people making journeys between home and work, or making trips in the course of their employer's business, and this is not a reliable indicator of the impact of the scheme on social inclusion in a given area. The approach adopted in the EqlA considers the mechanisms by which transport can relieve social disadvantage. Crossrail provides journey time savings, which means that, for example, more jobs are available to unemployed residents of deprived areas within a given journey time. These are accessibility benefits, and have been captured by the accessibility modelling. Transport schemes can improve social inclusion by offering journey opportunities that did not previously exist; this is best measured by accessibility modelling, not by considering the transport economic benefits to people already making trips, as suggested by this comment. The purpose of the EqlA is not to demonstrate that Crossrail delivers significant benefits to London and the South East (which is covered elsewhere, primarily in the business case documentation) – rather, the primary purpose is to ensure that where negative impacts do occur, they are properly considered in their local context, and issues relevant to a particular area and community are considered when deciding how best to approach the issue of impact mitigation.</p>



No.	Consultee/ Organisation	Comment	Response
26	The Institution of Highways and Transportation (IHT)	... that real progress in achieving social inclusion will be achieved. We believe therefore that an EqlA should aim to demonstrate that the benefits of Crossrail are disproportionately focussed, for example, on public transport users, whom we believe to be less well off than non-users of public transport, on locations where there are disproportionately high concentrations of deprivation or disadvantage, and on improving access to facilities that provide for basic educational attainment and basic healthcare, which are disproportionately used by disadvantaged people.	
27	The Institution of Highways and Transportation (IHT)	Content and Structure - The arrangement and structure of the document does not readily identify what we regard to be the key findings. As a pioneering document, it is clearly necessary to explain thoroughly the context and approach that has been followed.	The EqlA was presented as an ongoing piece of work and accompanied by appendices. The appendices clearly and thoroughly set out the context and approach.
28	London Equalities Commission	Provide the Commission with a paper setting out the consultation work that has been undertaken in the Spitalfields area.	A 'Spitalfields Consultation Activity' report has been submitted to the House of Commons Select Committee and supplied to the Commission. The Committee's First Special Report provides further details on the concerns of the Spitalfields' residents and the Committee's and Promoter's response to them (HC 235-I, Pages 24-27).



No.	Consultee/ Organisation	Comment	Response
29	London Equalities Commission	Trish Pashley, Greater London Action on Disability, to visit Crossrail to discuss accessibility of Crossrail stations including those that link to network rail.	A presentation was arranged.
30	London Equalities Commission	Provide information on Crossrail's plans for having inclusive stations.	Information Paper E5, 'Provisions for People with Restricted Mobility', sets out Crossrail's plans for inclusive stations. It is proposed that 'Design and Access Statements', addressing accessibility issues, will be submitted in support of relevant applications for the approval of details made of qualifying local authorities under the planning regime established in Schedule 7 of the Bill. In addition, access audits will be carried out during design development, and accessibility statements produced. In this way, issues of importance to people with restricted mobility will be taken into account as an integral part of the detailed design development.
31	London Equalities Commission	Forward monitoring information on Crossrail's targets to Lee Jasper and for circulation to the Commission.	Information was sent as requested on two occasions.
32	London Equalities Commission	Key milestones for the Crossrail project to be circulated to the Commission and that Crossrail be included in the work programme for future meetings of the Commission.	A key milestone programme was provided.



No.	Consultee/ Organisation	Comment	Response
33	London Equalities Commission	<p>The Commission attaches great importance to who benefits from the employment opportunities offered by the Crossrail development and considers it critical that every effort is made to ensure that those employed are reflective of the communities from which the labour force is drawn. In particular, the Commission would want to see the labour force in London benefit from these employment opportunities and would want to see Crossrail encouraging and supporting initiatives that ensure that local people from all the equality groups have been provided with the skills, experience and knowledge that will enable them to take up the opportunities in time for when they are likely to arise. The Commission would like Crossrail to provide it with periodic reports on the equalities profile of those employed to deliver the development, including those employed by contractors. The Commission is willing to work with Crossrail to develop suitable employment targets</p>	<p>Crossrail will ensure that it meets its requirements under 'The Public Contracts Regulations 2006' and adopts best practice to develop a supplier diversity policy framework that promotes equal access to contracts – which will encourage and support contractors to reflect, where practical, the local communities in which they work and to monitor progress against equality goals.</p>



No.	Consultee/ Organisation	Comment	Response
34	London Equalities Commission	<p>The Commission was concerned about the works proposed in the Spitalfields area and the impact this would have had on the local communities. The Commission was particularly concerned about the road safety issues, in the light of the increased volume of traffic that would occur whilst the works were being carried out and in the light of the statistics that indicate that disproportionately more Black and minority ethnic children are victims of road traffic accidents. The Commission very much welcomes the subsequent decision not to go ahead with these originally planned works.</p>	<p>TfL has undertaken road traffic accident research in the London Borough of Tower Hamlets that seems to allay the Commission's concerns. Controls on road traffic exist in the Construction Code. For example, certain lorry routes are non-operational during times when children are going to or leaving local schools. Crossrail acknowledges the statistical data regarding the disproportionate number of BAME children being involved in traffic accidents. A liaison group for schools in the Spitalfields area has been set up, discussions on Crossrail's current plans have taken place, and the schools are keen to be involved in the project's detailed design. All lorry routes will be subject to local authority approval.</p>



No.	Consultee/ Organisation	Comment	Response
35	London Equalities Commission	The Commission is concerned about what Crossrail's intention to make its stations "fully inclusive" and "fully accessible" will mean in practice. The Commission would expect this to at least mean providing a steps free environment, parking for disabled people, good lighting and accessible links to the rail network at Crossrail stations. The Commission would want disabled Londoners to be consulted alongside this.	Crossrail will significantly improve accessibility to key locations in London for those with reduced mobility. Crossrail is committed to the creation of an inclusive transport system and, where reasonably practicable, have made stations fully accessible. Crossrail will provide independent, step-free access from street level to the platforms in both directions at 28 of its stations, including all newly-built stations in the central tunnel section of the route. This means that, across the route, it is expected that 93% of all passenger trips on Crossrail will start and end at a Crossrail station with step-free access from street to platform level. Work to provide an inclusive transport system will continue throughout the life of the project. It is proposed that 'Design and Access Statements', addressing accessibility issues, will be submitted in support of relevant applications for the approval of details made of qualifying local authorities under the planning regime established in Schedule 7 of the Bill. In addition, access audits will be carried out during design development, and accessibility statements produced. In this way, issues of importance to people with restricted mobility will be taken into account as an integral part of the detailed design development.
36	London Equalities Commission	The Commission would like to receive periodic reports in progress against the key milestones of the development.	As the project has progressed through the Parliamentary process further EqlA work has taken place to reflect the Amendments to Provisions in the Bill. These have been published on the Crossrail website and have all been subject to a 12 week consultation period.



No.	Consultee/ Organisation	Comment	Response
37	City of London Access Group	Better integration with TfL/ LU stations for disabled access where possible.	All newly-built stations in the central tunnel section of the route will provide step-free access from street to platform level. Step-free access between Crossrail platforms and other railway and London Underground platforms will be provided where reasonably practicable. Where step-free access is not available, the proposal is that dignified, alternative arrangements or auxiliary aids will be employed. Details are set out in Information Paper E5, 'Provisions for People with Restricted Mobility'.
38	City of London Access Group	Advertise in national papers for out of London disabled visitors.	CLRL is consulting user groups of people with restricted mobility in areas directly related to stations on the detailed design, as those users will have greatest experience of using their local facilities. CLRL is and will continue to talk to these groups, as well as others with a wider remit, as part of the project's targeted consultation. As described above, it is proposed that 'Design and Access Statements', addressing accessibility issues, will be submitted in support of relevant applications for the approval of details made of qualifying local authorities under the planning regime established in Schedule 7 of the Bill. In addition, access audits will be carried out during design development, and accessibility statements produced. In this way, issues of importance to people with restricted mobility will be taken into account as an integral part of the detailed design development.
39	City of London Access Group	How are people with mental health issues being consulted or people in prisons / secure care at present who might need to be given (word unknown) for when they're released when Crossrail is built. Especially mention this as I voluntarily do care/social care work with reformed offenders who are due for release.	Local authorities are responsible for the education and rehabilitation needs of prison and hospital inmates, and CLRL does not propose making any special communication arrangements.



No.	Consultee/ Organisation	Comment	Response
40	City of London Access Group	Please will you look into doing some London based gay, lesbian, bisexual and transgender forums? As a gay man myself with a disability, I would appreciate such a forum being set up.	Existing workshop and forum arrangements are believed to be sufficient, and are designed to involve all equality priority groups.
41	City of London Access Group	Better consultation by way of meeting more disabled and gay people etc from outside the capital. Tourists / workers and disabled visitors will be coming into London.	Prior to and during construction, CLRL's Community Relations Strategy will continue to include all equality priority groups beneficially or adversely affected along the route. When the railway is running, the train operating company may use its own communications strategy and media and public relations procedures to inform these groups.
42	Individual	Crossrail should use national papers or print media in order to get feedback from disabled people in the rest of the country who come to London frequently.	The Environmental Statement and all the Amendment of Provisions have been advertised in 'Disability Now', which is a national publication, and stories have appeared periodically in the national media and on national TV and radio. CLRL circulates press releases to all the national media, and publicises them on the Crossrail website. CLRL has also advertised in national BAME media including Asian Times and The Nation.
43	Individual	How is Crossrail consulting people in London (disabled or elderly) - either monthly or bi monthly?	The Crossrail website and Helpdesk remain operative for anyone who wishes to contact the project. Periodic updates are sent to those registered on CLRL's contacts database. The Community Relations Strategy sets out how information will continue to be provided. All communications are designed to be inclusive.



No.	Consultee/ Organisation	Comment	Response
44	Prowse (Public Relations and Corporate Communications)	No doubt, for the construction stage, contracted workers' organisations submit a satisfactory Equality Policy and disclaimer so that Crossrail are not liable to action for any discriminatory behaviour by contracted management or staff working on the project (presumably this will include a disclaimer against any bullying and harassment towards staff or members of the public). I'm fairly certain that Crossrail staff will undoubtedly be covered by some form of internal Equality and Diversity Policy. If this is not the case, I'll be happy to clearance and provide a copy of a presentation which summarises a fairly comprehensive staff policy of one of my clients.	Crossrail will ensure that it meets its requirements under 'The Public Contracts Regulations 2006' and adopts best practice to develop a supplier diversity policy framework that promotes equal access to contracts.
45	Prowse (Public Relations and Corporate Communications)	My main comment after reflection relates to a real concern over the terminology 'Priority Groups'. Given the nature of the Crossrail approach, it seems worthwhile considering an opportunity to minimise inevitable degree of critique likely from those who seek opportunities to make disproportionate noises on behalf of sensitive groups. Possibly, replacing 'Priority Groups' with a title such as 'Potentially Disadvantaged Groups' might enhance the current documentation.	CLRL will give consideration to 'equality target groups' as the preferred reference, as proposed in TfL's Equality Impact Assessments guidance document.



No.	Consultee/ Organisation	Comment	Response
46	Prowse (Public Relations and Corporate Communications)	One other point is the use in public documents of the phrase 'People from black and ethnic minority groups', albeit government and some other organisations internally use 'BME' as standard protocol. Some race equality specialists believe the use of 'black' in a context that implies 'different' treatment of a person on the basis of skin colour alone is inflammatory. Therefore, there may be a case to consider future documentation to the public to refer simply to ethnic minority groups.	In line with Greater London Authority guidance, which was developed as a result of consultation with London's communities, CLRL will now use the term 'Black, Asian and Minority Ethnic (BAME) groups'.
47	London Borough of Tower Hamlets	Produce information on training initiatives (Business Forum, GLA, Young Crossrail etc).	In terms of the general skills across engineering CLRL is working with schools, professional institutions and industry to raise awareness and promote engineering as a profession, and it will also be supporting the introduction of the vocational Construction and Engineering Diplomas. In addition, CLRL is discussing with the relevant professional institutions the development of 'bite size' engineering technician training courses, which could allow unskilled or low skilled people develop sufficient initial knowledge to make them useful to employers and then extend their skills module by module whilst working. Discussions are also taking place with regards to the establishment of a skills academy for tunnelling engineers and a Crossrail Engineering Graduate Training Scheme.
48	London Borough of Tower Hamlets	Indication of basic entry level skills that could typically be expected of successful job applicants.	Development of a skills matrix is proposed in conjunction with advice from the London Equalities Commission and London Development Agency. It is anticipated that this will become more advanced with the appointment of the nominated undertaker.



No.	Consultee/ Organisation	Comment	Response															
49	London Borough of Tower Hamlets	Request of clarification of benefits for the borough.	<p>The London Borough of Tower Hamlets will benefit in three main ways: improved interchange opportunities; accessibility benefits; and regeneration, population and employment growth. Residents throughout Tower Hamlets will benefit from the improved opportunity for interchange onto Crossrail at Whitechapel station from the District, Metropolitan, Hammersmith &amp; City and East London lines. The table below shows that the greatest usage of Crossrail at Whitechapel is to/from the East London line, rather than to/from the station catchment area (the figures show morning peak three hour flows):</p> <table border="1" data-bbox="1066 699 1868 943"> <thead> <tr> <th><i>Combined 'to' and 'from' Crossrail</i></th> <th><i>Passengers</i></th> <th><i>Percentage</i></th> </tr> </thead> <tbody> <tr> <td>Station entrance</td> <td>2,000</td> <td>11%</td> </tr> <tr> <td>District line</td> <td>6,550</td> <td>37%</td> </tr> <tr> <td>East London line</td> <td>9,050</td> <td>52%</td> </tr> <tr> <td><b>Total</b></td> <td><b>17,600</b></td> <td><b>100%</b></td> </tr> </tbody> </table> <p>Crossrail will improve the accessibility of the Whitechapel and Isle of Dogs areas, with more people having access to the Royal London Hospital, Queen Mary College, the major employment centre at the Isle of Dogs, and the City and West End employment centres. There are also benefits in the form of reduced journey times and congestion relief. The new-build Crossrail stations at Whitechapel and the Isle of Dogs will significantly improve accessibility for people with restricted mobility.</p>	<i>Combined 'to' and 'from' Crossrail</i>	<i>Passengers</i>	<i>Percentage</i>	Station entrance	2,000	11%	District line	6,550	37%	East London line	9,050	52%	<b>Total</b>	<b>17,600</b>	<b>100%</b>
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No.	Consultee/ Organisation	Comment	Response
50	London Borough of Tower Hamlets	Explain the regeneration prospects for the borough.	Crossrail will improve access to jobs for unemployed or economically inactive residents of regeneration areas. CLRL estimates that up to 6,000 jobs could be taken up by unemployed or economically inactive residents of areas of deprivation within Tower Hamlets, as a result of Crossrail. This is 60% of the scheme total. Crossrail will encourage new residential and employment development around Whitechapel station and in the Isle of Dogs and Poplar areas. CLRL estimates this to be 1,000 homes and over 40,000 jobs over the next 20 years. The construction and operation of Crossrail will create a significant number of job opportunities for Tower Hamlets residents.
51	London Borough of Tower Hamlets	Produce a description of the skills data used for determining benefits.	The skills data used to assess the regeneration benefits was taken from the Annual Local Area Labour Force Survey, undertaken by the Office for National Statistics.
52	London Borough of Tower Hamlets	Ensure further consultation with local faith communities.	All consultation is designed to be inclusive. A Community Liaison Group has been set up in Spitalfields, made up of local people from the Spitalfields area. This was facilitated by an independent charity Planning Aid for London and is aimed at allowing local residents to raise local issues of concern.
53	London Borough of Tower Hamlets	Investigation of secondary effects of construction traffic on business.	The Highways and Traffic sub-group of the Crossrail Planning Forum will act as an overarching focus for consultation. It will consider general construction traffic issues and the procedures for obtaining consents once construction commences. The Environmental Statement provides an assessment of construction traffic impacts, and Information Papers D1, D2, D3, D6 and D19 contain information on the effects of construction traffic.

No.	Consultee/ Organisation	Comment	Response
54	London Borough of Tower Hamlets	Produce further data that underpins the EqIA.	An extensive dataset was published in the 'Community Impacts' specialist technical reports <sup>9</sup> at the time of the Crossrail Bill's deposit in Parliament.
55	London Borough of Tower Hamlets	Produce a copy of the local employment contract clauses being used by the East London line extensions.	These should be requested from the East London line extensions project.
56	London Borough of Tower Hamlets	Route-Wide Impacts - Relating to discretionary purchases, compulsory purchase, loss of business or employment is not directly mentioned.	These issues are policy issues and are covered by a set of Information Papers C1 – C11, 'Property & Compensation'.
57	London Borough of Tower Hamlets	Differential Impacts - If the EqIA were to be carried out effectively, then the element of subjectivity would be removed if data can be used to compare differential impacts through the use of facts and figures. Differential impact should not be decided upon through 'subjectivity': A review of perceived likely impacts should be addressed from point of consultation and basis of strong statistical assessment to consider the likelihood and probability of impact being negative towards priority groups.	Data and consultation comment has been used to inform decision making. It is the intention that mitigation measures are discussed with representatives of the equality priority groups through the consultation and community relations process.

<sup>9</sup> <http://billdocuments.crossrail.co.uk/80256FA10055060F/pages/specialisttechnicalreports>



No.	Consultee/ Organisation	Comment	Response
58	London Borough of Tower Hamlets	London Borough Tower Hamlets request an equality action plan.	It would not be appropriate for Crossrail to produce an Equality Action Plan in the same way as a local authority. Crossrail's Inclusivity team has a programme of works relating to key project milestones. Policies are reviewed and updated on a regular basis to reflect current legislation and a programme of mainstreaming is taking place as the detailed design develops.
59	London Borough of Tower Hamlets	Impact Selection Criteria - Increase reference to socio-economic and gender. Show further data on likely job impacts (loss of business or closure, or jobs created from increased economic activity or access to employment). Without effective, wide spread consultation these impacts will not be considered comprehensively. Impact Selection Criteria - The socio-economic impacts are vital and will impact more so on communities which have higher populations of BAME residents and workers.	The equality priority group of socio-economic, henceforth referred to as 'low-income earners' was a new group identified and introduced by CLRL. Crossrail will keep loss of business and closure to a minimum through the business relocation policy, and the consultation and community relations process will ensure all business owners are fully consulted. It is expected that Crossrail will create thousands of new jobs. The House of Commons Select Committee suggested the Promoter sets up a 'One Stop Shop' to work alongside Government agencies, to advertise how local individuals wishing to work on the project may apply for jobs connected with the project in Whitechapel and elsewhere.
60	London Borough of Tower Hamlets	Impact Selection Criteria - There are no likely negative impacts for women with young children using services, esp. those in the Whitechapel area.	Consideration of women's issues in an impact assessment generally includes childcare, as women are (still) the main providers.



No.	Consultee/ Organisation	Comment	Response
61	London Borough of Tower Hamlets	It may be relevant to consider the use of different languages in the signage for diversions, loss of facilities and parking etc.	CLRL has equality initiatives currently in place, as well as a socially inclusive Community Relations Strategy that recognises the need for appropriate information and signage formats.
62	London Borough of Tower Hamlets	Regarding the potential loss of St Helen's Church, it is vital that the Secretary of State is minded to address the needs of this faith group and others in defining the nature, form and delivery plan for the compensation. The implication of the compensation may in its own right cause adverse impacts and this will need to be discussed with residents and parishioners.	The form of any compensation will recognise relevant equality issues as appropriate.
63	London Borough of Tower Hamlets	Greater emphasis needs to be placed on both direct and indirect impacts, in particular the route-wide policies and practices being proposed to mitigate adverse impact.	It is hoped that any new, emerging or overlooked direct or indirect impacts will become known during ongoing consultation, assessment and design development.
64	London Borough of Tower Hamlets	Adopt a more social/human perspective to addressing impacts and a broad avoidance of the overly technical review of impacts which do not take account of the way impacts will become significant to local people.	The approach to date has tried to avoid becoming too technical. The availability of more detailed design information and pursuit of the Community Relations Strategy allows more meaningful discussion with local people. Crossrail has recently reviewed and updated the Information Papers in order to make them clearer and more accessible.



No.	Consultee/ Organisation	Comment	Response
65	London Borough of Tower Hamlets	The EqlA - an on-going process of consultation should be implemented and further site specific based EqlA's as and when deemed appropriate.	The project can be contacted on a continuous basis through the Helpdesk and website. Consultation will take place at appropriate times in the project development. Site-specific consultation has begun in Spitalfields through an independently run Community Liaison Group. This format will be used in other areas as appropriate.
66	London Borough of Tower Hamlets	Fully embrace the implications of the context of this EqlA on the diverse communities, demographics and diversity profiles that live in Tower Hamlets. The execution of the EqlA and its mitigation potentially falls short of the expectation of Tower Hamlets in terms of these demographic profiles.	Discussions with the Council to explore outstanding issues and assessment expectations will take place at an appropriate project stages.
67	London Borough of Tower Hamlets	Attempt to address direct and indirect impacts of the scheme and give reference to proportional impact and disproportional impact both on communities and indeed on particular equality priority groups.	Proportional impacts form part of the Environmental Impact Assessment. The EqlA has sought to identify disproportionate impacts, and will continue to seek to address them in the ongoing process.



No.	Consultee/ Organisation	Comment	Response
68	London Borough of Tower Hamlets	It would have been useful to examine the impact register to assess the outcome of completed consultations. Ensure to include the right data upon which to make findings on likely concerns and adverse impacts. Reflect the needs of the borough's diverse population.	The impact register was presented in the EqIA report at Appendix 4 and the consultation results appear at Appendix 7.
69	London Borough of Tower Hamlets	Temporary Partial and Route-Wide Impacts - Also likely to be secondary implications of the workforce being employed to develop the system and the equality policies that will safeguard the equality commitment.	Crossrail will ensure that it meets its requirements under 'The Public Contracts Regulations 2006' and adopts best practice to develop a supplier diversity policy framework that promotes equal access to contracts.
70	London Borough of Tower Hamlets	Aim and Scope of Consultation - provide sufficient consultation with Tower Hamlets about the likely equality benefits or likely adverse equality impacts. There is little detail to confirm how Crossrail engaged groups that are regarded as hard to reach (which make up high % of residents in Whitechapel and Docklands area).	Consultation has sought to be socially inclusive. Discussions with the Council have identified some new consultation initiatives and a number of valuable community contacts have been identified through the parliamentary process. The Community Relations Strategy explains how the project will continue to engage with interested parties.



No.	Consultee/ Organisation	Comment	Response
71	London Borough of Tower Hamlets	Temporary Partial and Route-Wide Impacts - In addition, Tower Hamlets propose that, from an equality perspective, other impacts should be considered i.e. loss of business, loss of employment, noise and vibration impacts, disability access issues, impact on specific communities in key locations, potential employment opportunities directly out of development process for Crossrail and other opportunities through Crossrail completion.	These topics are covered by various Information Papers.
72	London Borough of Tower Hamlets	Inclusive Consultation - Ensure further consultation with <i>all</i> groups; address the basic forms of inclusive communication and consultation through translation, interpretation, signage and affecting the use of social model of communications and community engagement.	Consultation material has been and will continue to be provided in accessible formats. The strategy aims to engage with all equality priority groups.
73	London Borough of Tower Hamlets	Differential Impacts - Omit 'a perception of discrimination where environmental or community impacts affect.....priority communities, even though the impacts are felt by all parties'. EqIA should be relying on clear empirical evidence of disproportionality of impact.	This section explained that there are environmental impacts that do not have a differential impact and therefore do not feature in the EqIA. It was on the basis that there was no evidence of differential impact that, for completeness, a decision was taken to refer to areas of perceived discrimination.



No.	Consultee/ Organisation	Comment	Response
74	London Borough of Tower Hamlets	Impacts by Location - The description of the specific impacts appear to be limited; there is a disproportionately high level of impact on BME communities.	This comment has been noted. Any further specific impacts will be reported in future reports.
75	London Borough of Tower Hamlets	Impacts by Location - The mitigation examples should identify the specific types of differential information the mitigation research is seeking to address; real mitigation should state the actual compensation that will be used to mitigate adverse impacts.	The assessment in question was undertaken at a policy level with specification and quantification proposed in future work.
76	London Borough of Tower Hamlets	Ensure that the reliance of the undertaker to fulfil recommendations of the EqIA is supported throughout development of Crossrail.	This comment has been noted.
77	London Borough of Tower Hamlets	The permanent impact within Tower Hamlets (Eleanor Street) - Ensure to reflect the needs and desires of the families on the site when relocating, and establish a well defined strategy for relocation. Fully engage with residents.	CLRL has engaged with the residents to establish a strategy for relocation. A joint working group comprising the Council, CLRL and the Travellers was formed to consider the needs and desires of the families. An Amendment of Provisions in the Bill (AP2) proposed a design change that would allow the families to relocate to a suitable site. This amendment was accepted by the House of Commons Select Committee. A further EqIA (AP EqIA) was published to reflect the change in impact.



No.	Consultee/ Organisation	Comment	Response
78	London Borough of Tower Hamlets	Tower Hamlets then proceeded to supply supplementary EqlA key data and information giving cause to argue that LBTH has a particular set of needs from its diverse client groups. This seeks to confirm that these needs have a real bearing on the likely impact of the Crossrail development as well as on the well being of the borough's diverse communities.	Crossrail acknowledges this concern. The House of Commons Select Committee heard a great deal of concern from a number of residents, and in their report they showed concern at the lack of clear information being provided and felt some action was necessary, which the Promoter has accepted. However, the Committee felt that it was necessary to " <i>reassure the community that the scale of the works and length of construction in the area has been largely overestimated by some residents.</i> " (HC 235-I, Page 24). This has, in some cases, led to a perception that the borough's diverse community will be impacted more than other communities along the route.
79	London Borough of Tower Hamlets	Test of Reasonableness - This definition could also address the consequences of the impact, in particular to key equality target groups, as well as to review the proportionality and / or disproportionality of that impact. Ensure that we uphold ' mitigation of an adverse impact for certain communities even if felt only by a small section of community'.	This comment has been noted for future work.
80	London Borough of Tower Hamlets	Likely Equality Benefits - Regarding jobs and educational opportunities, Bangladeshi residents are unlikely to be reassured by Crossrail's proposed benefits (during and post construction), many of the residents employed in retail businesses.	Crossrail cannot be expected to deliver benefit to everyone, but it will help to integrate the area, provide links to international travel, and improve access to the culture and businesses in Banglatown, including the retail traders.



No.	Consultee/ Organisation	Comment	Response
81	London Borough of Tower Hamlets	Effects of Traffic on Areas of Deprivation - The Borough would need to consider its car ownership and use of public transport modes by ethnicity in the specific geographic area directly impacted upon. Tower Hamlets recognise that the community may acknowledge the need for change to encourage regeneration, that negative impacts must not be achieved at the expense of their environment, moreover they would want to ensure that any identified negative impacts are mitigated effectively.	This comment has been noted.
82	London Borough of Tower Hamlets	Produce a working paper explaining route alignment selection through LBTH.	A number of papers have been provided on route alignment.



## **4 Conclusions and next steps**

- 4.1 Equality assessment will continue throughout the design, construction and early operational life of the project. Having established a policy position in the majority of cases, mitigation can continue to be developed accompanied by ongoing assessment, monitoring and review.
- 4.2 As the project develops and progresses towards the design stage, it is anticipated that a further update of the EqIA will take place, following Royal Assent of the Crossrail Bill and CLRL becoming a 100% owned subsidiary of TfL. All of the public consultation comment, as included in this report, will be reviewed for inclusion in a final project and policy assessment report.
- 4.3 Crossrail is in a stronger position to develop its design, construction and operational planning, both to meet statutory requirements and to deliver a railway fit for the purpose of serving the needs of the whole community.